

RESPONDENT NAME: SOLUTIA INC.

ORDER TYPE: X 1660 AGREED ORDER	FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING
	1	SOAH HEARING
FINDINGS DEFAULT ORDER	_SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
AMENDED ORDER	_EMERGENCY ORDER	
CASE TYPE:	,	
X_AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE
PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	OCCUPATIONAL CERTIFICATION
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
TYPE OF OPERATION: Organic chemic SMALL BUSINESS: X Yes OTHER SIGNIFICANT MATTERS: The facility location.		forcement actions currently pending against this
INTERESTED PARTIES: No one other th	an the ED and the Respondent expressed an int	terest in this matter.
COMMENTS RECEIVED: The Texas Re	gister comment period expired May 4, 2009. N	To comments were received.
Ms. Lena Robe SEP Coordinator: Ms. Sharon Blu TCEQ Enforcement Coordinator TCEQ Enforcement Coordinator TCEQ Regional Contact: Ms. Lin	ook, Litigation Division, MC 175, (512) 239-18 rts, Litigation Division, MC 175, (512) 239-00 re, Litigation Division, MC 175, (512) 239-222 rs. Ms. Kimberly Morales, Air Enforcement Section, Ms. Miriam Hall, Air Enforcement Section, Mada Vasse, Houston Regional Office, MC R-12, President and CEO, Solutia Inc., 575 Maryvil i, 63166-6760	19 3 tion, MC R-12, (713) 422-8938 MC 128, (512) 239-1044 (713) 767-
Respondent's Attorney: Mr. Eric	Groten, Vinson & Elkins, LLP, The Terrace 7, exas 78746-7568	2801 Via Fortuna, Suite 100,

RESPONDENT NAME: SOLUTIA INC. DOCKET NO.: 2008-0062-AIR-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION

PENALTY CONSIDERATIONS

CORRECTIVE ACTIONS TAKEN/REQUIRED

Type of Investigation:

___ Complaint

X Routine

___ Enforcement Follow-up

__ Records Review

Date of Complaint Relating to this Case:

None

Dates of Investigations Relating to this Case:

February 19, 2007; November 27, 2007; September 10, 2007; December 4, 2007; January 31, 2008; February 14, 2008, June 2, 3 and 16, 2008; and July 22, 2008.

Dates of NOEs Relating to this Case:

August 28, 2007, October 16, 2007, December 14, 2007, January 29, 2008, February 15, 2008, April 21, 2008, April 25, 2008, June 20, 2008, July 3, 2008, July 30, 2008.

Background Facts:

An EDPRP was filed in case nos. 34886 and 34678 on January 23, 2008. Those two cases were subsequently consolidated with case nos. 35189, 35488, and 36002. A signed agreed order resolving the five consolidated cases was signed on February 9, 2009.

AIR:

- 1. Failed to comply with a permit limit of 4.50 pounds per hour ("lbs/hr") for NOx emissions from the AN-7 Process Air Startup Heater. Specifically, NOx emissions were 5.39 lbs/hr [30 Tex. ADMIN. CODE § 116.115(c); Permit No. 38336 Special Condition No. 4, and Tex. Health & Safety Code § 382.085(b)].
- 2. Failed to test for compliance with carbon monoxide ("CO") emission limits [30 Tex. ADMIN. CODE \S 117.8000 and Tex. Health & Safety CODE \S 382.085(b)].
- 3. Failed to submit Annual Compliance Certification for the period beginning November 29, 2004 through November 28, 2005, with the required certification language, and failed to identify this deficiency in the semi-annual deviation report for the time period of November 28, 2005 through May 28, 2006 [30 Tex. ADMIN. CODE §§ 122.143(4), 122.145(2)(A), and 122.146(1); Operating Permit No. O-02319, General Terms and Conditions; and Tex. Health & Safety CODE § 382.085(b)].

Total Assessed: \$117,048

Total Deferred: \$58,524

Expedited Order

Financial Inability to Pay

X SEP Conditional Offset

Total Paid to General Revenue: \$58,524

The Respondent paid \$58,524 of the administrative penalty. The remaining \$58,524 of the administrative penalty shall be conditionally offset by the completion of a Supplemental Environmental Project (SEP).

Site Compliance History Classification

__High <u>X</u> Average __Poor

Person Compliance History Classification
High X Average Poor

Major Source: X Yes No

Applicable Penalty Policy: September 2002

Corrective Actions Taken:

The Executive Director recognizes that the Respondent has undertaken the following corrective measures:

- 1. On October 26, 2006, submitted an application to amend NSR Permit No. 38336 to increase the permitted maximum allowable emissions rate for Nitrogen Oxide ("NOx") for the AN-7 Process Air Startup Heater ("EPN 70H101-1"), and on August 28, 2008, received an amended permit with increased emissions rates for the startup heater. Testing conducted on March 28, 2008, demonstrated that the heater was in compliance with the new revised NOx and CO maximum allowable emission rates.
- 2. On September 24, 2007, revised the process for reporting annual compliance certifications and deviation reports, and trained staff responsible for filing those reports.
- 3. On October 2, 2007, personnel were retrained for timely reporting of emissions events to the agency, and on November 8 and 9, 2007, revised and re-trained personnel on the applicable crossover procedure for the Waste Heat Boiler system.
- 4. On April 22, 2008, reduced fuel firing rates based on current stack test established emission rates to reduce NOx from Heaters 50H1-1, 50H1-2, 50H1-3, 50H3, 51H1, 51H5 and 51H6 to the allowable level set forth in the permit.
- 5. On June 2, 2008 revised its standard operating procedures "Operate High Pressure Feedwater Pumps, Work Practice HPFW-42.21" and associated check lists to require the operator to verify that the pump and backup pump(s) switches are set to "auto" start to prevent an incident similar to the November 26, 2007, emissions event.
- 6. On May 15, 2008, submitted procedures designed to prevent a recurrence of the September 26, 2007, emissions event, and on June 5, 2008, submitted corrective actions for the October 30, 2007, emissions event.
- 7. On September 26, 2008, submitted procedures designed to prevent a recurrence of the February 29 and March 2, 2008, emissions events.

RESPONDENT NAME: SOLUTIA INC. **DOCKET NO.: 2008-0062-AIR-E**

Permit No. 38336/PSD-TX-910, Special Condition No. 4].

VIOLATION SUMMARY CHART: CORRECTIVE ACTIONS VIOLATION INFORMATION PENALTY CONSIDERATIONS TAKEN/REQUIRED 8. On November 14, 2008, submitted procedures 4. Failed to prevent unauthorized emissions. Specifically, 98.7 lbs of hydrogen cyanide ("HCN"), 357.4 lbs of designed to prevent a recurrence of the March 27, acrylonitrile ("AN") and 5 lbs of acrolein were released when 2008, emissions event. the Respondent failed to open the manual block valve during crossover of Acrylonitrile Unit 3 off gas to the Acrylonitrile Ordering Provision(s): Unit 2 Waste Heat Boiler resulting in the over pressure of the system, causing an emissions event which began on August 5, Within 30 days, the Respondent shall implement 2007, and lasted for five minutes. Since this emissions event and complete a Supplemental Environmental Project (SEP) (See SEP Attachment A). was avoidable and reported late, the Respondent failed to meet the demonstration criteria for an affirmative defense under 30 Tex. Admin. Code § 101.222 [30 Tex. Admin. Code § 116.115(c), Air Permit No. 18251, Special Condition No. 4; and Tex. Health & Safety Code § 382.085(b)]. 5. Failed to submit the initial notification within 24 hours of discovery of an emissions event that started on August 5, 2007 [30 Tex. ADMIN. CODE § 101.201(a)(1)(B) and Tex. HEALTH & SAFETY CODE § 382.085(b)]. 6. Failed to prevent an unauthorized emissions event which occurred on September 26, 2007. Specifically, approximately 189 lbs of AN, 308 lbs of HCN, and 258 lbs of volatile organic compounds ("VOCs") were released from emissions point number ("EPN") 30H5 during a 36 minute event. The emission limits for AN, HCN and VOCs are 2.09, 1.26 and 12.04 lbs/hr, respectively. Since the emissions event was avoidable, it does not meet the demonstration criteria for an affirmative defense in 30 Tex. Admin. Code § 101.222(b)(1-11) [30 TEX. ADMIN. CODE § 116.115(c), Air Permit No. 18251, Special Condition No. 4, and Tex. HEALTH & SAFETY CODE § 382.085(b)]. 7. Failed to prevent an unauthorized emissions event which occurred on October 30, 2007. Specifically, approximately 99 lbs of AN, 210 lbs of HCN, and 535 lbs of VOCs were released from EPN 30H5 during a one hour nine minute event. The emission limits for AN, HCN and VOCs are 2.09, 1.26 and 12.04 lbs/hour, respectively. Since the emissions event was avoidable, it does not meet the demonstration criteria for an affirmative defense in 30 Tex. ADMIN. CODE § 101.222(b)(1-11) [30 Tex. ADMIN. CODE § 116.115(c), Air Permit No. 18251, Special Condition No. 4, and TEX. HEALTH & SAFETY CODE § 382.085(b)]. 8. Failed to comply with permitted emissions limits. Specifically, during a reference method stack test conducted on March 28, 2008, it was determined that NOx and CO emissions from the AN-7 Process Air Startup Heater, EPN 70H101-2, were 8.62 lbs/hr and 13.47 lbs/hr respectively. The emission limits for this EPN are 4.50 lbs/hr for NOx and 6.0 lbs/hr for CO [30 Tex. ADMIN. CODE §§ 101.20(3) and 116.115(c), TEX. HEALTH & SAFETY CODE § 382.085(b), and

RESPONDENT NAME: SOLUTIA INC. DOCKET NO.: 2008-0062-AIR-E

9. Failed to prevent unauthorized emissions. Specifically, an emissions event occurred on February 29, 2008 due to a preventible electrical spile at EFN 31H4, which lasted for one hour and 43 minutes and resulted in the release of 15.20 lbs of HCN and 52.68, bls of the VOC propylen. The emission limits for this EFN are 1.26 lbs/m for HCN and 4.01 lbs/m for VOC. Since this emissions event could have been avoided by good design, operation and maintenance practices, and was improperly reported, it did not meet the demonstration criteria for an affirmative defense in 30 TEX. ADMR. CODE § 101.222 [30 TEX. ADMR. CODE § 101.222 [30 TEX. ADMR. CODE § 101.222 [30 TEX. ADMR. CODE § 101.227 [30 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 110.127 [30 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 110.15 [30 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 110.15 [30 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 110.15 [30 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 10 TEX. ADMR. CODE § 110.15 [30 TEX. ADMR. CODE § 10 TEX. ADMR.	VIOLATION SUMMARY CHART:		
an emissions event occurred on February 29, 2008 due to a preventable electrical spike at ERN 31144, which lasted for one hour and 43 minutes and resulted in the release of 15.20 lbs of HCN and \$26.80 lbs of the VOC propylenc. The emission limits for this EPN are 1.26 lbs/hr for HCN and 4.01 lbs/hr for VOC. Since this emissions event could have been avoided by good design, operation and maintenance practices, and was improperly reported, it did not meet the demonstration criteria for an affirmative deferse in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE § 115.115(c), TEX. HBALTH & SAFETY CODE § 382.085(b), and Permit No. 18251, Special Condition No. 4]. 10. Failed to prevent unauthorized emissions. Specifically, an emissions event occurred on March 2, 2008 due to a preventable electrical spike at EPN 31144, which lasted for 37 minutes and resulted in the release of 166 lbs of the VOC propylene. The emission limits for this EPN are 4.01 lbs/hr for VOC. Since this emissions event could have been avoided by good design, operation and maintenance practices, it did not meet the demonstration criteria for an affirmative defense in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE § 101.22	VIOLATION INFORMATION		
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RESPONDENT NAME: SOLUTIA INC. DOCKET NO.: 2008-0062-AIR-E

VIOLATION SUMMARY CHART:	- AND	and the same of th
VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
13. Failed to prevent unauthorized emissions on November 26, 2007 when the secondary backup pump, Pump 350P1-3, failed to start automatically when the primary boiler feed water pump, Pump 350P1-2, failed. Specifically, during the emissions event which lasted five minutes, the total unauthorized emissions were 355.59 lbs of VOCs and 50.54 lbs of HCN. Because these emissions could have been foreseen and		
avoided by good operating practices, the demonstration criteria for an affirmative defense in 30 Tex. ADMIN. Code § 101.222 could not be met [30 Tex. ADMIN. Code § 116.115(c), Tex. Health & Safety Code § 382.085(b), and Permit No. 18251, Special Condition No. 4].		
14. Failed to comply with the combined maximum allowable emission rate ("MAER") for NOx for seven Linear Alkyl Benzene ("LAB") Unit heaters during stack testing conducted on February 27-28, 2007 and March 1-2 and 14, 2007. Specifically, the combined NOx MAER for Heaters 50H1-1, 50H1-2, 50H1-3, 50H3, 51H1, 51H5 and 51H6 is 18.0 lbs/hr. During		
testing, the actual combined rate was 21.85 lbs/hr [30 Tex. ADMIN. CODE § 116.115(c), Tex. HEALTH & SAFETY CODE § 382.085(b), and Permit No. 6534, Special Condition No. 1].		
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Attachment A Docket Number: 2008-0062-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:

SOLUTIA INC.

Penalty Amount:

One hundred seventeen thousand forty-eight dollars (\$117,048)

SEP Offset Amount:

Fifty-eight thousand five hundred twenty-four dollars (\$58,524)

Type of SEP:

Pre-approved

Third-Party Recipient:

Houston-Galveston Area Emission Reduction Credit

Organization ("AERCO") Clean Cities/Clean Vehicles Program

Location of SEP:

Brazoria County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to AERCO for the *Clean Cities/Clean Vehicles Program* in Brazoria County as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, SEP funds will be used to aid local school districts and area transit agencies, and may be used to reach local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP funds will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. SEP funds will be used for the costs of retrofitting or replacing older diesel buses with alternative fueled or clean fuel diesel buses. The older "high emission" buses will be permanently retired and sold only for scrap. This project will be administered in accordance with federal, state, and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

B. Environmental Benefit

Passengers, drivers, and students in the area where school buses idle during transportation are subject to harmful diesel exhaust emission every school day. Apart from containing the ozone precursors nitrogen oxides ("NOx") and hydrocarbons ("HC"), diesel exhaust is known to cause or exacerbate a number of respiratory diseases, including asthma. Due to the more stringent emissions standards introduced by the Environmental Projection Agency (EPA), model 2007 and newer buses are also cleaner in terms of particulate matter (PM) emissions than model year 2004 buses. New NOx and HC standards phased in between 2007 and 2010 will

SOLUTIA INC.
Agreed Order Docket 2008-0062-AIR-E

result in new school bus engines being 72% cleaner for HC and 90% cleaner for NOx than a bus produced to meet the 2004 federal standards for these pollutants.

This SEP will provide a discernible environmental benefit by retiring high-emission buses from service, purchasing newer, clean fuel technology buses, and replacing newer buses with fuel treatment technology that reduces PM and HC.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Houston-Galveston Area Council Houston-Galveston AERCO P.O. Box 22777 Houston, TX 77227-2777

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall submit a check for any remaining amount due made payable to "Texas Commission on Environmental Quality" with the notation "SEP Refund" and the docket number of the case, and shall send it to:

SOLUTIA INC. Agreed Order Docket 2008-0062-AIR-E

> Texas Commission on Environmental Quality Office of Legal Services Attention: SEP Coordinator, MC 175 P.O. Box 13088 Austin, Texas 78711-3088

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEO. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

	Penalty Calculatio	n Worksheet (P	CW)	
Policy Revision 2 (Sept	lember 2002)		PCW Revision Nove	ember 6, 2007
TCEQ	47 D 0007 L			
DATES Assigned PCW	17-Dec-2007 3-Jun-2008	EPA Due 8-Sep-2008		
RESPONDENT/FACILITY	INFORMATION		47 (4.4)	
Respondent	Solutia Inc.]
Reg. Ent. Ref. No.	RN100238682	,		
Facility/Site Region	12-Houston	Major/Minor Source	Major	
CASE INFORMATION				
Enf./Case ID No.	35189	No. of Violations	2	1
	2008-0062-AIR-E	Order Type	1660	
Media Program(s)	Air		Kimberly Morales	
Multi-Media			Enforcement Team 5	J
Admin. Penalty \$!	_imit Minimum \$0 Maximum	\$10,000		
	Penalty Calcula	ation Section		
TOTAL BASE PENAL	TY (Sum of violation base penaltic	and the second of the second o	Subtotal 1	\$3,500
TOTAL DAGLT LIVE	, i , (Outil Of Violation Daos politica			
ADJUSTMENTS (+/-) Subtotals 2-7 are obtain	TO SUBTOTAL 1 ned by multiplying the Total Base Penalty (Subtotal 1) by			
Compliance Histo	ory 158%	Enhancement Subto	otals 2, 3, & 7	\$5,530
	Enhancement due to 13 NOVs with same o	r similar violations, 20 NOVs		
Netes	with unrelated violations, including 11 mo	nthly self-reported effluent		
Notes	violations, and three 1660 Agreed Orders.			
	of audit letters and one notice of audit wit	h a disclosure of violation.		
				4.5
Culpability	No 0%	Enhancement	Subtotal 4	\$0
Notes	The Respondent does not meet the	e culpability criteria.		
Cood Poith Effor	t to Comply 0%	Reduction	Subtotal 5	. \$0
Good Faith Effor	Before NOV NOV to EDPRP/Settlement Offer	Reduction	Jubiciai 5	Ψ-
Extraordinary	Boloto No.			
Ordinary		A Company		
N/A	X (mark with x)		1	
Notes	The Respondent does not meet the	e good faith criteria.		
110100	The respendent does not meet an			
	200 0 € 6 € 6 € 6 € 6 € 6 € 6 € 6 € 6 € 6 €	Enhancement*	Subtotal 6	\$0
	Total EB Amounts \$384 *Capped	d at the Total EB \$ Amount		<u> </u>
Approx.	Cost of Compliance \$6,000			
SUM OF SUBTOTAL	e 1.7		Final Subtotal	\$9,030
SUM OF SUBTOTAL	3 1-7		mai Subtotai	40,000
OTHER FACTORS AS	S JUSTICE MAY REQUIRE	0%	Adjustment	\$0
•	ubtotal by the indicated percentage.			
	,			
Notes				
		Final Day] nalty Amount	\$9,030
		rillai rei	nany Amount	ψ3,000
STATUTORY LIMIT A	ADJUSTMENT	Final Asse	essed Penalty	\$9,030
CC.C.C.C. Emili			er e	
DEFERRAL	and the second of the second o	0% Reduction	Adjustment	\$0
	alty by the indicted percentage. (Enter number only; e.g.			
Notes	No deferral offered because this is not a	an expedited settlement.		-
DAVADI E DEMALTY		· · · · · · · · · · · · · · · · · · ·		\$9,030
PAYABLE PENALTY		AND THE PARTY OF T		ψ3,030
		EXHIBIT		

Screening Date 7-Jan-2008

Docket No. 2008-0062-AIR-E

PCW

Respondent Solutia Inc.

Case ID No. 35189

Policy Revision 2 (September 2002) PCW Revision November 6, 2007

Reg. Ent. Reference No. RN100238682

Media [Statute] Air

Enf. Coordinator Kimberly Morales

Campalia		Compliance History Worksheet			
		Site Enhancement (Subtotal 2) Number of	Enter Number Here	Adjust.	
	NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	13	65%	
		Other written NOVs	20	40%	
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	3	60%	
		Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%	
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%	
l		Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%	
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		-5%	
	Addito	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	1	-2%	
		Plea	se Enter Yes or No		
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No No	0%	
	Outer	Participation in a voluntary pollution reduction program	No	0%	
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	t No	0%	
		Adjustment F	Percentage (St	ubtotal 2)	158
Repeat	Violator (Su	·		и	
L	No	Adjustment F	Percentage (St	uptotal 3) [0%
Compli		Person Classification (Subtotal 7)	Mandani d		i disa
	Average Po	erformer Adjustment F	Percentage (St	ubtotal 7)	0%
Compli	ance History	Summary			
		Enhancement due to 13 NOVs with same or similar violations, 20 NOVs with unrelated viola	ations, including		
(Compliance History Notes	11 monthly self-reported effluent violations, and three 1660 Agreed Orders. Reduction due audit letters and one notice of audit with a disclosure of violation.	to five notice of		

Screening Dat	e 7-Jan-2008	Docket No. 2008-0062-AIR-E	PCW
Responden	t Solutia Inc.	Policy	Revision 2 (September 2002)
Case ID No	. 35189	PCW	Revision November 6, 2007
Reg. Ent. Reference No	. RN100238682		
Media [Statute] Air		
Enf. Coordinato	r Kimberly Morales		
Violation Numbe	r 1		=
Rule Cite(s	30 Tex. Admin	Code § 116.115(c), Tex. Health & Safety Code § 382.085(b) and Permit No. 38336, Special Condition No. 4	. :
Violation Descriptio	n ("NOx") emissions during a refe	with a permit limit of 4.50 pounds per hour ("lbs/hr") for nitrogen oxide from the AN-7 Process Air Startup Heater ("70H101-1"). Specifically rence method stack test conducted on February 19, 2007, it was ined that NOx emissions from 70H101-1 were 5.39 lbs/hr.	,
		Base Penalty	\$10,000
>> Environmental, Property	and Human Has	lth Matrix	+ 95
>> Environmental, Ftoperty		Harm	
Releas		oderate Minor	
OR Actu	al	х	
Potenti	al	Percent 25%	
			, t
>>Programmatic Matrix			
Falsification	n Major Mo	oderate Minor Percent 0%	•
Matrix Notes Human hea		ent has been exposed to an insignificant amount of pollutants that do protective of human health or environmental receptors.	Transmission of the state of th
		Adjustment \$7,500	0]
And Controlled in the Special State of Section Wearded State (Section Section	types yaf gafagi, yateligen oyo keel diigiina ka jibada Abbas Miligia ka Bii Dilliniid ii Bii Dilliniid aa b Bii baas	all a minut A minut de NA Millian A d'aide de de projection de la minut de NA Millian	- ***
			\$2,500
Violation Events			
Number of \	iolation Events	1 Number of violation days	
mark only on	daily monthly quarterly	x Violation Base Penalt	\$2,500
with an x	semiannual annual single event		
One quarte		nded based on the dates the AN-7 Process Air Startup Heater was in a scheduled reactor startup (February 18 - 20, 2007).	
Economic Benefit (EB) for t	his violation	Statutory Limit Test	
Estimat	ed EB Amount	\$192 Violation Final Penalty Tota	\$6,450
	Burga Baran Burga Baran Indonesia	This violation Final Assessed Penalty (adjusted for limits) \$6,450

Respondent	t Solutia Inc.						
Case ID No.	35189						
Reg. Ent. Reference No.	-RN100238682	•		•			
Media							Years of
Violation No						Percent Interest	Depreciation
Violation No	• •		alian and the same of			1	1 m 2 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$					•	
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	-			0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$3,000	19-Feb-2007	31-May-2008	1.3	\$192	- n/a	\$192
Notes for DELAYED costs	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat	nitted limits for NO e that corrective a	x emissions from 70 ction is estimated to	H101-1. Date be completed.
Notes for DELAYED costs Avoided Costs	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat	nitted limits for NO e that corrective a item (except for	x emissions from 70 ction is estimated to one-time avoided c	H101-1. Date be completed.
Notes for DELAYED costs Avoided Costs Disposal	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat ntering 0.0	nitted limits for NO se that corrective a item (except for \$0	x emissions from 70 ction is estimated to one-time avoided c	H101-1. Date be completed.
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat ntering 0.0 0.0	nitted limits for NO te that corrective a item (except for \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c	H101-1. Date be completed.
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat ntering 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided company \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat 0.0 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c \$0 \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat ntering 0.0 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0 \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat 0.0 0.0 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c \$0 \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat ntering 0.0 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0 \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat 0.0 0.0 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated ex Required is th	opense to demons e date of the stack	trate compliance wi test. Final Date is	th perm the dat 0.0 0.0 0.0 0.0 0.0	itted limits for NO te that corrective a item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	x emissions from 70 ction is estimated to one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	H101-1. Date be completed. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$

Screening Date	7-Jan-2008	Docket N	lo. 2008-0062-AIR-E	PCW
Respondent	Solutia Inc.		•	Policy Revision 2 (September 2002)
Case ID No.	35189			PCW Revision November 6, 2007
Reg. Ent. Reference No.	RN100238682			
Media [Statute]	Air			
Enf. Coordinator	Kimberly Morales			
Violation Number	2			,
Rule Cite(s)	30 Tex. Admin. Co	ode § 117.8000 and Tex. He	alth & Safety Code § 382.085(l	b)
Violation Description			("CO") emission limits for 70H ducted on February 19, 2007.	1101-1
			Base P	Penalty \$10,000
>> Environmental, Property				
OR Release Actua Potentia		and the second s	Percent 10%	
>>Programmatic Matrix	Mojor Modoro	to Minor		•
Falsification	Major Modera	te Minor	Percent 0%	#
			Percent 076	-
Matrix Notes Human heal		uld be exposed to an insignif ective of human health or en	icant amount of pollutants that vironmental receptors.	:would
			Adjustment	\$9,000
				\$1,000
Violation Events				
Number of Vi	olation Events 1	322	Number of violation days	
mark only one with an x	daily monthly quarterly semiannual annual single event x		Violation Base P	Penalty \$1,000
	· · · · · · · · · · · · · · · · · · ·			
	One	e single event is recommend	led.	
Economic Benefit (EB) for th	ils violation		Statutory Limit Test	
Estimate	d EB Amount	\$192	Violation Final Penalty	y Total \$2,580
		This violation Final Ass	sessed Penalty (adjusted for	limits) \$2,580

	E	conomic	Benefit W	orks	heet		
Respondent	Solutia Inc.						
Case ID No	. 35189						
Reg. Ent. Reference No							
Media							Years of
Violation No	-					Percent Interest	Depreciation
violation No	. Z					1	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	1 · No commas or \$						
	,- ••						
Delayed Costs							
Equipment	· · · · · · · · · · · · · · · · · · ·	ı		0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0,0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$3,000	19-Feb-2007	31-May-2008	1.3	\$192	n/a	\$192
Notes for DELAYED costs	of t	he stack test. Fina	I Date is the date the	hat corre	ective action is est	0H101-1. Date Requimated to be completed to be completed to be completed to be avoided cone-time avoid	ted.
Avoided Costs	AININ	UALIZE [1] avoiu	eu costs pelote e	0.0	\$0	\$0	\$0
Disposal				0.0	\$0	\$0	\$0 \$0
Personnel Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
= =				0.0	\$0	\$0	\$0
Other las neenens			· · · · · · · · · · · · · · · · · · ·	,	·	·	
Other (as needed)	Į.I						
Notes for AVOIDED costs					•	·	

Compliance History

Customer/Respondent/Owner-Operator:

Regulated Entity:

ID Number(s):

CN600132856 RN100238682 Solutia Inc.

CHOCOLATE BAYOU PLANT

Classification: AVERAGE

Rating: 2.31

Classification: AVERAGE

Site Rating: 1.61

	· ·	•
AIR OPERATING PERMITS	ACCOUNT NUMBER	BL0038U
AIR OPERATING PERMITS	PERMIT	1258
AIR OPERATING PERMITS	PERMIT	2317
AIR OPERATING PERMITS	PERMIT	2318
AIR OPERATING PERMITS	PERMIT	2319
AIR OPERATING PERMITS	PERMIT	2320
AIR OPERATING PERMITS	PERMIT	2321
AIR OPERATING PERMITS .	PERMIT	2322
AIR OPERATING PERMITS	PERMIT	2323
AIR OPERATING PERMITS	PERMIT	2324
AIR OPERATING PERMITS	PERMIT	2325
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	0200049
WASTEWATER	PERMIT	WQ000001000
WASTEWATER	PERMIT	TPDES0003875
WASTEWATER	PERMIT	TX0003875
AIR NEW SOURCE PERMITS	PERMIT	2271
AIR NEW SOURCE PERMITS	PERMIT	3046
AIR NEW SOURCE PERMITS	PERMIT	5065
AIR NEW SOURCE PERMITS	PERMIT .	5084
AIR NEW SOURCE PERMITS	PERMIT	5336
AIR NEW SOURCE PERMITS	PERMIT	6534
AIR NEW SOURCE PERMITS	PERMIT	8372
AIR NEW SOURCE PERMITS	PERMIT	14488
AIR NEW SOURCE PERMITS	PERMIT	18130
AIR NEW SOURCE PERMITS	PERMIT	18251
AIR NEW SOURCE PERMITS	PERMIT	28694
AIR NEW SOURCE PERMITS	PERMIT	32151
AIR NEW SOURCE PERMITS	PERMIT	34029
AIR NEW SOURCE PERMITS	PERMIT	38336
AIR NEW SOURCE PERMITS	PERMIT	38998
AIR NEW SOURCE PERMITS	PERMIT	39171
AIR NEW SOURCE PERMITS	PERMIT	39643
AIR NEW SOURCE PERMITS	PERMIT	
		48895
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	BL0038U
AIR NEW SOURCE PERMITS	AFS NUM	4803900009
AIR NEW SOURCE PERMITS	EPA ID	PSDTXP910
AIR NEW SOURCE PERMITS	PERMIT	18251
AIR NEW SOURCE PERMITS	REGISTRATION	75639
AIR NEW SOURCE PERMITS	REGISTRATION	76211
AIR NEW SOURCE PERMITS	REGISTRATION	71232
AIR NEW SOURCE PERMITS	EPA ID	PSDTX307A
AIR NEW SOURCE PERMITS	REGISTRATION	71063
AIR NEW SOURCE PERMITS	REGISTRATION	72689
AIR NEW SOURCE PERMITS	REGISTRATION	
		72545
AIR NEW SOURCE PERMITS	REGISTRATION	74040
AIR NEW SOURCE PERMITS	REGISTRATION	73707
AIR NEW SOURCE PERMITS	REGISTRATION	74788
AIR NEW SOURCE PERMITS		
	REGISTRATION	75318
AIR NEW SOURCE PERMITS	REGISTRATION	77064
AIR NEW SOURCE PERMITS	REGISTRATION	77079
AIR NEW SOURCE PERMITS	REGISTRATION	78148
AIR NEW SOURCE PERMITS	REGISTRATION	78728
AIR NEW SOURCE PERMITS	REGISTRATION	79253
AIR NEW SOURCE PERMITS	REGISTRATION	80379
AIR NEW SOURCE PERMITS	REGISTRATION	80616
AIR NEW SOURCE PERMITS	REGISTRATION	83109
RADIOACTIVE WASTE DISPOSAL	LICENSE	RW0219
UNDERGROUND INJECTION CONTROL	PERMIT	WDW013
UNDERGROUND INJECTION CONTROL	PERMIT	
		WDW224
UNDERGROUND INJECTION CONTROL	PERMIT	WDW318
UNDERGROUND INJECTION CONTROL	PERMIT	WDW326
UNDERGROUND INJECTION CONTROL	PERMIT	WDW359
UNDERGROUND INJECTION CONTROL		
	PERMIT	WDW002
UNDERGROUND INJECTION CONTROL	PERMIT	WDW001
INDUSTRIAL AND HAZARDOUS WASTE PROCESSING	EPA ID	TXD001700806
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION #	30138
	(SWR)	00100
INDUSTRIAL AND HAZARDOUS WASTE GENERATION		77/7000 :=====
MOSS TAINE AND TIMENTEDOUS WAS IN GENERATION	EPA ID	TXD001700806

PERMIT

PERMIT

(SWR)

PERMIT

PERMIT

PERMIT

LICENSE

SOLID WASTE REGISTRATION #

TXR05O891

0200049

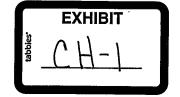
50189

30138

50189

50189

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STORMWATER

WATER LICENSING

IHW CORRECTIVE ACTION

INDUSTRIAL AND HAZARDOUS WASTE COMPLIANCE PLANS

INDUSTRIAL AND HAZARDOUS WASTE POST CLOSURE

INDUSTRIAL AND HAZARDOUS WASTE STORAGE

INDUSTRIAL AND HAZARDOUS WASTE STORAGE

Location:

FM 2917, ALVIN, TX, 77512

Rating Date: September 01 07 Repeat Violator: NO

TCEO Region:

REGION 12 - HOUSTON

Date Compliance History Prepared:

January 02, 2008

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

January 02, 2003 to January 02, 2008

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

John Muennink

Phone:

(361) 825-3423

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? 2. Has there been a (known) change in ownership of the site during the compliance period? Yes No

3. If Yes, who is the current owner? 4. if Yes, who was/were the prior owner(s)? N/A

5. When did the change(s) in ownership occur?

N/A

N/A

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 10/10/2003 1

ADMINORDER 2002-0174-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: SC 2 PERMIT

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak from the heat exchangers into the

water of cooling towers E379CT3, E379CT4, and 70382EG.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Part 63, Subpart G 63.120(b)(9)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: SC 2 PERMIT

Description: Failure to notify the TCEQ in writing 30 days in advance of seal gap measurements taken in affiliation with the 1999, 2000, and 2001

annual external floating roof tank inspection of tanks 332T1-1 and 332T1-2.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.133(d) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to adequately conduct the 2001 seal gap measurements and generate raw data and

calculations relating to external floating roof tank 332T1-1.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC5C PERMIT

Description: Failure to conduct stack testing of incinerator 55H2 within 60 days of start-up of the facilities.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120 40 CFR Part 63, Subpart G 63.152(c)(2) 5C THC Chapter 382, SubChapter A 382,085(b)

Description: Failed to submit a complete periodic report. Specifically, the periodic report submitted on April 25, 2000 for the October 1999 to March

2000 reporting period did not reference or include data pertaining to incinerator EPN 55H2.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.118(f)(3)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: Failed to submit complete periodic reports.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)(1)

40 CFR Part 63, Subpart G 63.120(d)(2)(i) 40 CFR Part 63, Subpart G 63.122(b)

Rgmt Prov: SC2 PERMIT

Description: Failure to have an adequate monitoring plan for absorbers 320S322-1 and 320S322-2, that ensures the absorbers are being properly

operated and maintained.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: Not specified PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rates Table (MAERT) contained in TCEQ Air Permit No. 38336 for waste heat

boiler EPN 70Z401 by emitting VOCs at 9.52 pounds per hour (lbs./hr) when the permitted limit is 8.89 lbs./hr.

Effective Date: 02/20/2006

2

3

ADMINORDER 2005-0555-AIR-E

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: TCEQ Air Permit #39171, SC#4 PA

Description: Equistar failed to close the automatic inlet valve to the incinerator.

Effective Date: 11/19/2007

ADMINORDER 2005-0166-AIR-E

Classification: Minor

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to report the November 17, 2004 emissions event within 24 hours after its discovery. Specifically, the emissions event that was discovered on November 17, 2004 was not reported until December 22, 2004 as documented during an investigation conducted from April 22, 2005

to May 2, 2005.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

TCEQ Air Permit No. 18251, SC#4 PA

Description: Failure to comply with permitted emissions imitd during an emisisons event on November 17, 2004.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-02317, ST&C 3A(iii) OP

Description: Failure to maintain records documenting quarterly opacity observations of tank 55T12 and scrubber 55K1, as reported in a deviation

report for the period of June 1, 2004 through NOvember 30, 2004 for the NTA Unit.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115,146(2)

5C THC Chapter 382, SubChapter D 382,085(b)

Description: Failure to maintain records documenting the VOC concentration of the exhaust gas associted with 578T5 in order to demonstrate proper function of the carbon canister control equipment, as reported ina deviation report for the period of June 1, 2004 through November 30, 2004 for the

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: NSR 2271, GC 8 PERMIT

Description: Failure to comply with the permitted short-term ammonia emissions limits for scrubber 55K1, as reported ina deviation report for the

period of December 1, 2004 thorugh May 31, 2005 for the NTA unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: NSR 2271, GC 1 PERMIT

Description: Failure to comply with the permit representations relating to annual HTMA production, annual ammonia usage, and annual ammonia

production, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the NTA unit.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.132(e)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to include the following emisison units in the Title V application: 55S101, 55S102, 55S103, and 55S104.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter D 382,085(b)

Description: Failure to obtain authorization for the carbon absorption system on wastewater tank 57T5 prior to installation, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: General Condition No. 1 OP

Description: Failure to operate residue strip tank 57T34 on June 12 and 28, 2004 and August 16, 2004 within temperature ranges specified in the permit application, as reported in a deviation report for the period of Une 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: General Condition No. 8 OP

Description: Failure to include all gas streams going to vent condenser 57E22 from exceeding rolling annual permitted emissions limits, as reported

ina deviation report for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 18251 and N-011, SC No. 4 PA

Description: Failure to prevent unauthroized emisisons during an October 9, 2005 emissions event.

B. Any criminal convictions of the state of Texas and the federal government.

NIZ

C. Chronic excessive emissions events.

NI/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1 01/23/2003 (157075) 2 01/31/2003 (22887)3 02/07/2003 (9887) 4 02/12/2003 (24271)5 02/18/2003 (24434)6 02/21/2003 (157034) 7 02/26/2003 (26108)8 02/26/2003 (25864)9 02/26/2003 (26050) 10 02/26/2003 11 02/26/2003 (26041)12 02/26/2003 (25983)13 02/26/2003 (25859) 14 02/26/2003 (26112)15 02/26/2003 (25851)16 02/26/2003 (25988)17 02/26/2003 (25854)18 02/26/2003 (26078)19 02/27/2003 (24374)20 03/04/2003 (23648)

21 03/12/2003 (27234) 22 03/21/2003 (157037) 23 03/28/2003 (28455)

24 04/21/2003 (157042) 25 05/20/2003 (37989)

26 05/21/2003 (157046) 27 06/20/2003 (157050)

27 06/20/2003 (157050) 28 07/01/2003 (36597)

29 07/22/2003 (157054) 30 08/14/2003 (148336)

31 08/14/2003 (148343) 32 08/19/2003 (149876)

33 08/21/2003 (151361) 34 08/21/2003 (151374)

35 08/25/2003 (150697) 36 08/25/2003 (294923)

37 09/11/2003 (248057) 38 09/11/2003 (248048)

39 09/23/2003 (294925)

40 10/21/2003 (294927) 41 10/27/2003 (281097)

41 10/2//2003 (281097) 42 10/29/2003 (253450)

43 10/29/2003 (253464)

44 11/12/2003 (253266) 45 11/12/2003 (252275)

46 11/21/2003 (294928) 47 11/25/2003 (255837)

48 11/25/2003 (255830) 49 11/25/2003 (250820)

49 11/25/2003 (250820) 50 11/25/2003 (255834) 51 11/25/2003 (255835)

52 12/02/2003 (255621) 53 12/18/2003 (257385)

54 12/18/2003 (257514)

55 12/23/2003 (294929) 56 01/12/2004 (258960)

57 01/12/2004 (258944)

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58 01/16/2004
                    (255951)
 59 01/23/2004
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 60 02/23/2004
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61 02/26/2004
                   (255896)
62 02/27/2004
                    (262913)
                    (262943)
63 02/27/2004
 64 02/27/2004
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65 02/27/2004
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 66 02/27/2004
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67 02/27/2004
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68 03/22/2004
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69 03/29/2004
                    (267307)
70 03/30/2004
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71 04/12/2004
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72 04/13/2004
                    (265167)
73 04/16/2004
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74 04/20/2004
                    (294916)
75 05/25/2004
                    (294918)
76 06/17/2004
                    (273007)
77 06/21/2004
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78 07/23/2004
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79 07/30/2004
                    (284372)
80 08/03/2004
                    (283906)
81 08/19/2004
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82 08/31/2004
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 83
    09/01/2004
                    (271988)
84 09/01/2004
                    (270694)
 85 09/01/2004
                    (272089)
86 09/01/2004
                    (289574)
87 09/20/2004
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 88 09/23/2004
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89 09/23/2004
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    10/13/2004
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91 10/13/2004
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 92 10/22/2004
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 93 10/22/2004
                    (351918)
 94 11/03/2004
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95 11/03/2004
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 96 11/04/2004
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97 11/05/2004
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 98 11/05/2004
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99 11/16/2004
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100 11/16/2004
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101 11/16/2004
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102 11/16/2004
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103 11/16/2004
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104 11/17/2004
105 11/22/2004
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106 11/23/2004
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107 12/09/2004
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108 12/09/2004
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109 12/10/2004
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110 12/10/2004
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112 12/13/2004
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113 12/14/2004
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117 12/17/2004
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119 12/20/2004
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120 12/20/2004
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121 12/22/2004
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122 12/23/2004
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123 12/28/2004
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124 12/30/2004
125 12/30/2004
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126 01/03/2005
                    (343620)
127 01/03/2005
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128 01/14/2005
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129 02/14/2005
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130 02/14/2005
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131 02/21/2005
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132 02/22/2005
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134 02/28/2005
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135 03/24/2005
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136 04/04/2005
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137 04/06/2005
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138 04/06/2005

(376392)

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141 04/06/2005
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142 04/06/2005
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143 04/08/2005
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145 04/19/2005
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152 05/31/2005
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                    (348652)
153 06/08/2005
154 06/13/2005
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155 06/23/2005
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156 06/29/2005
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158 07/21/2005
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159 08/16/2005
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163 08/24/2005
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164 08/24/2005
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166 08/29/2005
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167 08/30/2005
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168 09/01/2005
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174 10/24/2005
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175 11/28/2005
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176 12/20/2005
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177 12/20/2005
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178 12/20/2005
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179 12/30/2005
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180 01/09/2006
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181 01/23/2006
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182 01/24/2006
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183 01/24/2006
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184 01/30/2006
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185 02/14/2006
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186 02/14/2006
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187 02/16/2006
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188 02/21/2006
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189 03/03/2006
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190 03/20/2006
                    (498075)
191 04/17/2006
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192 04/19/2006
                    (451614)
193 04/24/2006
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194 04/30/2006
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195 05/12/2006
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196 05/12/2006
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197 05/12/2006
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198 05/12/2006
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199 05/12/2006
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200 05/16/2006
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201 05/17/2006
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202 05/18/2006
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203 05/18/2006
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205 05/31/2006
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206 05/31/2006
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207 05/31/2006
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208 05/31/2006
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209 06/05/2006
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210 06/21/2006
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211 06/21/2006
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212 06/23/2006
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213 06/29/2006
                    (482600)
214 06/29/2006
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215 06/29/2006
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216 07/10/2006
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217 07/20/2006
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223	08/31/2006	(480128)				
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225	09/21/2006	(520097)		•		
226	10/23/2006	(544349)				
227	10/27/2006	(516020)				
228	10/27/2006	(516053)				
229	11/08/2006	(518116)				
230	11/29/2006	(531921)		•		
231	11/29/2006	(532004)				
232	11/29/2006	(544350)				
233	12/07/2006	(532264)				
234	12/08/2006	(531936)				
235	12/11/2006	(518239)				
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237	12/27/2006	(544351)				
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239	01/18/2007	(535916)				
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247	02/16/2007	(512464)				
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249	02/21/2007	(539360)				
250	02/22/2007	(539395)				
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256	03/26/2007	(575044)				
257	04/12/2007	(543396)				
258	04/12/2007	(543389)				
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262	04/19/2007	(575045)				
263	05/23/2007	(575046)				
264	06/08/2007	(543508)				
265	06/13/2007	(563309)				
266	06/25/2007	(575047)	•			
267	06/26/2007	(558363)				
	07/05/2007	(565543)				
269	07/05/2007	(564044)				
270	07/06/2007	(560348)				
271	07/23/2007					
272	08/17/2007	(575048)				
		(571117)				
273	08/17/2007	(571120)				
274	08/17/2007	(571122)				
275		(571113)				
276		(571116)				
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278	08/28/2007	(566965)	*			
279	08/28/2007	(566968)				
280	08/29/2007	(572199)				
281	08/30/2007	(571497)				
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283	09/27/2007	(594475)				
284	09/27/2007	(593895)				
285	09/28/2007	(565072)				
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288	10/19/2007	(607509)				
289	10/31/2007	(607507)				
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		(598289)				•
291		. (598293)				
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293	11/06/2007	(599382)				
294	12/03/2007	(595635)				
	12/14/2007	(609886)				
296	12/17/2007	(599351)				
297	12/17/2007	(610670)				
298	12/17/2007	(599355)				
299	12/20/2007	(611714)				
300	12/20/2007	(611710)				

Written notices of violations (NOV), (CCEDS Inv. Track. No.) Date 01/31/2003 (157034)Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter Description: (294923) Date 07/31/2003 2 Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter Description: 10/31/2003 (294928)3 Date Classification: Self Report? Moderate 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a) Description: Failure to meet the limit for one or more permit parameter Date 03/30/2004 (332762)Self Report? Classification: Moderate 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 305, SubChapter F 305.125(17) Description: NON-RPT VIOS FOR MONIT PER OR PIPE Date 05/31/2004 (294920) Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a) Description: Failure to meet the limit for one or more permit parameter Date 11/16/2004 (339730)6 Classification: Self Report? Moderate 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) Rgmt Prov: PERMIT 18251 and N-011, S.C No. 4 Description: Failure to operate the flare within MAERT limits Date 11/17/2004 (340850) Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PERMIT 18251, S.C No.4 Failure to prevent the leaks from the valves 30HIC4-A/B and caused the release of air contaminants from the emission Description: point which is not listed in the MAERT. Date 11/18/2004 (341009)8 Self Report? Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PERMIT 18251, S.C. No.4 Description: Failure to prevent tripping of the boiler (30H5) and relit the burners in a timely manner and caused the release of air pollutants from the emission point that was not listed in the MAERT. Date 11/22/2004 (340787)Self Report? Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1) Failure to to submit the initial notification of the emissions event within 24 hours after the start of incident. Description: Self Report? Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PERMIT 32151, S.C. No.1 Description: Failure to limit the emissions from the scrubber within the MAERT limits. Date 12/13/2004 10 (262649)Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PA TCEQ Air Permit No. 18251, SC #4 Description: Solutia failed to prevent moisture from entering the igniter unit on the flare. Date 12/20/2004 (335252)11 Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b) Rqmt Prov: PA TCEQ Air Permit #18251, SC #1 Description: Sterling Chemicals failed to prevent external corrosion on a pipeline. 12 Date 12/31/2004 (351918) Self Report? Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26,121(a) Description: Failure to meet the limit for one or more permit parameter Date 01/03/2005 13 (343620)Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) Rgmt Prov: PA TCEQ Air Permit No. 38336, SC #4 Solutia inadvertently sent steam through the drain line to the process sewer increasing the pressure in the process sewer Description: tank.

Classification:

Minor

E.

Self Report?

NO

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B) Citation:

Failure to report an emissions event (Incident #45511) that occurred at the AN7 Unit in a timely manner. Description:

Date 02/14/2005 14

(348976) Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation:

5C THC Chapter 382, SubChapter A 382,085(b)

Solutia failed to prevent a fire suppression discharge which resulted in a release of 145 pounds (lbs) of Halon 1301 Description:

(bromotrifluoromethane).

Date 04/04/2005 15 Self Report?

(349690)

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation:

5C THC Chapter 382, SubChapter A 382,085(b)

The regulated entity failed to prevent a shutdown of the AN2 waste heat boiler due to the malfunction of the valve Description:

positioner.

Self Report? Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Solutia, Inc., - Chocolate Bayou Plant failed to identify on the emissions event report the permit number authorization.

Classification:

Moderate

Moderate

Moderate

Minor

Moderate

Moderate

Minor

Moderate

Moderate

Moderate

Moderate

Moderate

Major

Description: 16 Date 07/21/2005

(398102)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT TCEQ Permit #18251, SC #4

Solutia failed to include the facility's authorization limit and number on the final report. Description:

Self Report? Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description: Solutia failed to include the facility's authorization limit and number on the final report.

Date 08/24/2005 17 Self Report?

18

(377022)

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT 18251 SC 4

Solutia failed to properly tighten a valve. Description:

08/24/2005 Date (349399)

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov PA TCEQ Air Permit No. 38998, SC#4

Description: The regulated entity failed to prevent a leak in a propylene pump.

Self Report?

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description: failed to identify the permit number representing the propylene pump in the emissions event report.

19 Date 09/30/2005 (468248)

> Self Report? Citation:

30 TAC Chapter 305, SubChapter F 305,125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

20 Date 10/31/2005 (468249)

Self Report? Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

21 Date 02/16/2006 (405519)

> Self Report? 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) Citation:

Description: Failure to record quarterly opacity observation on Unit ID: 350H1-1 .

Self Report? Classification: Moderate

30 TAC Chapter 115, SubChapter B 115.142(1)(E) Citation: Description:

Solutia, Inc., failed to equipt Unit IDs:P-10 and P-13, with a Close-Vent system. 22

Date 02/17/2006 (405519)

Self Report? Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)

Ramt Prov: **PERMIT 0-02325** Description: Failure to comply with the requirements of 30 TEX. ADMIN. CODE Chapter 106.472(9).

23 Date 03/02/2006 (457603)

Citation: 30 TAC Chapter 113, SubChapter C 113.120 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov PERMIT SC 2

Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak from the heat Description:

exchangers into the water of cooling towers E379CT3, E379CT4, and 70382EG.

Self Report?

Self Report?

Citation: 2A TWC Chapter 7, SubChapter A 7.101

Ramt Prov: ORDER Ordering Provision 3.a.

Description: Failure to comply with ordering provisions of the Commission Order Docket No. 2002-0174-AIR-E.

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Classification:
           Self Report?
                                                                                                                                      Moderate
                              30 TAC Chapter 116, SubChapter B 116.115(c)
           Citation:
                              5C THC Chapter 382, SubChapter A 382.085(b)
           Rqmt Prov:
                              PERMIT No. 18251, Special Condition 4
           Description:
                               Failure to prevent unauthorized emissions.
                                                                                                                    Classification:
                                                                                                                                      Moderate
           Self Report?
                              30 TAC Chapter 101, SubChapter F 101.221(a)
           Citation:
                              Failure to maintain the AN2 Flare in good working order during facility operations.
           Description:
                                                 (520096)
           Date 07/31/2006
25
                                                                                                                    Classification:
           Self Report?
                                                                                                                                      Moderate
           Citation:
                              30 TAC Chapter 305, SubChapter F 305.125(1)
                               TWC Chapter 26 26.121(a)
                               Failure to meet the limit for one or more permit parameter
           Description:
                                                 (520097)
           Date 08/31/2006
26
           Self Report?
                                                                                                                    Classification:
                                                                                                                                      Moderate
           Citation:
                              30 TAC Chapter 305, SubChapter F 305.125(1)
                               TWC Chapter 26 26.121(a)
                              Failure to meet the limit for one or more permit parameter
           Description:
          Date 08/31/2006
                                                 (480128)
27
          Self Report?
                                                                                                                    Classification:
                                                                                                                                      Moderate
           Citation:
                              30 TAC Chapter 116, SubChapter B 116.116(a)(1)
                              5C THC Chapter 382, SubChapter D 382.085(b)
                              Failure to maintain the tank throughputs for the acetic tank and water circulating tank as represented in the permit
           Description:
                              application dated February 29, 2000 for the TCEQ Permit no. 38336.
           Self Report?
                          ΝO
                                                                                                                   Classification:
                                                                                                                                      Minor
                              30 TAC Chapter 115, SubChapter D 115,352(4)
           Citation:
                              30 TAC Chapter 116, SubChapter B 116,115(c)
                              30 TAC Chapter 122, SubChapter B 122.143(4)
                              40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
                              5C THC Chapter 382, SubChapter D 382.085(b)
           Rqmt Prov:
                              PERMIT 38336, Special Condition 23.E
                              OP O-02324, Special Condition 18
                              OP O-02324, Special Condition 1A
           Description:
                              Failure to install caps/plugs/flanges on eight open-ended lines in unit 70ANFUG.
           Self Report?
                                                                                                                   Classification:
                                                                                                                                      Minor
          Citation:
                              30 TAC Chapter 115, SubChapter D 115.352(2)
                              30 TAC Chapter 122, SubChapter B 122.143(4)
                              40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(2)
                              5C THC Chapter 382, SubChapter D 382.085(b)
           Rgmt Prov:
                              OP O-02324, Special Condition 1A
          Description:
                              Failure to conduct a first attempt at repair on 1 valve within five calendar days after a leak was detected in the AN 7 Unit.
          Self Report?
                                                                                                                   Classification:
                                                                                                                                      Minor
          Citation:
                              30 TAC Chapter 116, SubChapter B 116.115(c)
                              30 TAC Chapter 122, SubChapter B 122.143(4)
                              5C THC Chapter 382, SubChapter D 382,085(b)
                              PERMIT 38336, Special Condition 12B
          Ramt Prov:
                              OP O-02324, Special Condition 18
          Description:
                              Failure to maintain three pilots on the flare 70Z522.
          Self Report?
                                                                                                                   Classification:
                                                                                                                                      Moderate
          Citation:
                              30 TAC Chapter 116, SubChapter B 116.115(c)
                              30 TAC Chapter 122, SubChapter B 122.143(4)
                              5C THC Chapter 382, SubChapter D 382.085(b)
                              PERMIT 38336, Special Condition 4
          Ramt Prov:
                              PERMIT 38336, Special Condition 8A
                              OP O-02324, Special Condition 18
          Description:
                              Failure to maintain the NOx emissions from the boiler 70Z401 within the permit limit in the AN7 Unit.
28
          Date 11/29/2006
                                                 (532004)
          Self Report?
                                                                                                                   Classification:
                                                                                                                                      Moderate
          Citation:
                              30 TAC Chapter 116, SubChapter B 116.115(c)
                              5C THC Chapter 382, SubChapter A 382.085(b)
          Ramt Prov:
                              PERMIT No. 38998, Special Condition 4
          Description:
                              Failure to prevent unauthorized emissions.
          Date 12/31/2006
                                                 (544352)
29
          Self Report?
                                                                                                                   Classification:
                                                                                                                                      Moderate
          Citation:
                              30 TAC Chapter 305, SubChapter F 305.125(1)
                              TWC Chapter 26 26.121(a)
                              Failure to meet the limit for one or more permit parameter
          Description:
30
          Date 02/16/2007
                                                 (512464)
          Self Report?
                                                                                                                   Classification:
                                                                                                                                      Minor
          Citation:
                              30 TAC Chapter 115, SubChapter D 115.352(4)
                              30 TAC Chapter 116, SubChapter B 116.115(c)
                              30 TAC Chapter 122, SubChapter B 122.143(4)
                              40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
                              5C THC Chapter 382, SubChapter D 382.085(b)
          Rqmt Prov:
                              OP FOP O-02321, SC 12
                              OP FOP O-02321, SC 1A
                              PA NSR 18251 SC 14E
                              PA NSR 18251, SC 12E
          Description:
                              Failure to cap 10 open-ended lines in HRVOC and HAP service.
                 02/21/2007
                                                (539360)
31
          Date
```

Date 07/25/2006

24

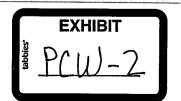
(485504)

Classification: Self Report? Moderate 30 TAC Chapter 331, SubChapter D 331.63(e) Citation: Rqmt Prov: PERMIT PROVISION VII.D. Description: Violation of maximum injection flow rate. 32 Date 08/31/2007 (607508) Self Report? Classification: Moderate Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter Date 09/27/2007 (594475) 33 Self Report? Classification: Minor Citation: 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) OP FOP No. 2324, Spec. Cond 18 Rqmt Prov: OP FOP No. 2324, Spec. Cond. 1A PERMIT NSR Permit No. 38336, Spec. Cond. 20E Failure to seal four (4) open ended lines in VOC service during the compliance period. Description: Environmental audits. Notice of Intent Date: 09/23/2004 (347742) No DOV Associated Notice of Intent Date: (453378) 01/03/2006 No DOV Associated Notice of Intent Date: 04/07/2006 (462917) No DOV Associated Notice of Intent Date: 05/25/2006 (481532) Disclosure Date: 11/14/2006 Viol. Classification: Minor Rgmt Prov: PERMIT 32151, SC 8A Description: Failure to notify the regional office 45 days prior to schedule stack sampling for scrubber 83S14 and 83S6. Notice of Intent Date: 04/23/2007 (559025) No DOV Associated Type of environmental management systems (EMSs). Voluntary on-site compliance assessment dates. Participation in a voluntary pollution reduction program. Early compliance. N/A Sites Outside of Texas

G.

N/A

Policy Revision 2 (Septe	Penalty Calculatio	n Worksheet (Po	CW) PCW Revision Sept	ember 19, 2007
TCEQ				1.57 17 2.44 1.74
DATES Assigned PCW	4-Sep-2007 15-Jan-2009 Screening 21-Sep-2007	EPA Due 25-May-2008		
RESPONDENT/FACILITY_				
Respondent				
Reg. Ent. Ref. No. Facility/Site Region		Major/Minor Source	Major	
CASE INFORMATION	ing the second of the second o		· Silver of Marine	1980 A. S. S. Salasia
Enf./Case ID No.	34678	No. of Violations	1	- Carlonia Company
1	2008-0062-AIR-E	Order Type		
Media Program(s)	Air	Enf. Coordinator		
Multi-Media Admin. Penalty \$ L	imit Minimum \$0 Maximum	\$10,000	EnforcementTeam 5	
4	Penalty Calcula	ation Section		
TOTAL BASE PENAL	ΓΥ (Sum of violation base penaltic	Company of the Compan	Subtotal 1	\$2,500
ADJUSTMENTS (+/-)	TO SUBTOTAL 1 ad by multiplying the Total Base Penalty (Subtotal 1) by	y the indicated percentage		
Compliance Histo	ന്നും അന്റെ വായത്തിന്റെ സ്വാധ്യായുടെ സുവാനത്ത് വായനായ വാധ്യായിരുന്നും ആയാന് എന്നും ആയുന്നും വായ്യായുടെ വാര് വേണ്	CONTROL OF THE PROPERTY OF THE PROPERTY OF THE PARTY OF T	tals 2, 3, & 7	\$2,900
Notes	Penalty enhancement due to two 1660 at similar NOVs, and 29 non-similar NOVs of effluent violations. Penalty reduction for Disclosure of Viola	which 11 were self-reported 5 Notice of Audits and one	and the second s	
∟ Culpability	No 0%	Enhancement	Subtotal 4	\$0
Notes	The Respondent does not meet th	e culpability criteria.	de the control to the	•
Good Faith Effort	to Comply 10% Before NOV NOV to EDPRP/Settlement Offer	Reduction	Subtotal 5	\$250
Extraordinary	Before NOV NOV to EDPRP/Settlement Offer			
Ordinary	x			
N/A	(mark with x)			
Notes	The Respondent completed the corrective 2007.	actions on September 24,		
		"Antimitation in the content of the content of the content of the	GUAZZINIARANIAN I SANSA	
	to at altitude director a reactifulation and a second second and a second second and a second section and a second second section and a second section and a second section are second section as a sec	Enhancement* I at the Total EB \$ Amount	Subtotal 6	\$0
SUM OF SUBTOTALS	1-7	F I.	nal Subtotal	\$5,150
OTHER FACTORS AS Reduces or enhances the Final Sul	JUSTICE MAY REQUIRE ototal by the indicated percentage.	0%	Adjustment	\$0
Notes				
L	· · · · · · · · · · · · · · · · · · ·	Final Pena	alty Amount	\$5,150
STATUTORY LIMIT AL	DJUSTMENT	Final Asses	sed Penalty	\$5,150
DEFERRAL Reduces the Final Assessed Penal	ty by the indicted percentage. (Enter number only; e.g	Reduction	Adjustment	\$0
Notes	No deferral offered because the ca			in the state of th
PAYABLE PENALTY				Am 470
		2000년 - 다마마 스펙트립스 [1] - 스스앤리 리스		\$5,150



Policy Revision 2 (September 2002) PCW Revision September 19, 2007

Respondent Solutia Inc. Case ID No. 34678

Reg. Ent. Reference No. RN100238682

Media [Statute] Air

Enf. Coordinator Kimberly Morales

Compliance History Worksheet
Site Enhancement (Subtotal 2)

Compon	ARCHAROL CAME	nter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	5	25%
	Other written NOVs	29	58%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	2	40%
Order	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgme		0	0%
and Cons Decres	IAny adjudicated final court judgments and default judgments, or non-adjudicated tinal court	0	0%
Convicti	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissic		0	0%
Audit	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	5	-5%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	1	-2%
	Pleas	e Enter Yes or No	L
	Environmental management systems in place for one year or more	No	0%
Othe	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No:	0%
	Adjustment Po	ercentage (Si	ubtotal 2
epeat Violato	(Subtotal 3)		
	No Adjustment Po		
and the second s			
Avera	ge Performer Adjustment Pe	ercentage (Si	uptotal 7
ompliance Hi	story Summary	Maria de la composición del composición de la composición de la composición del composición de la composición de la composición de la composición de la composición del composición de la composición del composic	
Complia Histo Note	of which 11 were self-reported effluent violations. Penalty reduction for 5 Notice of Audit		
			•

Screening Date	21-Sep-2007	Docket N	lo. 2008-0062-AIR-E	PCW	
Respondent	Solutia Inc.		Po	licy Revision 2 (September 2002)	
Case ID No.	34678		PC	W Revision September 19, 2007	
Reg. Ent. Reference No.	RN100238682				
Media [Statute]	Air				
Enf. Coordinator	Kimberly Morales			•	
Violation Number	1				
Rule Cite(s)	30 Tex. Admin. Code §§ 123 02319, General Terms ar	2.143(4), 122.145(2)(A) nd Conditions and Tex. I	, 122.146(1), Operating Permit No Health & Safety Code § 382.085(b	.O-)	
Violation Description Failed to submit the Annual Compliance Certification for the period between November 29, 2004 through November 28, 2005, with the required certification language. In addition, Solutia failed to identify this deficiency in the semi-annual deviation report for time period of November 28, 2005 through May 28, 2006.					
			Base Pen	alty \$10,000	
>> Environmental, Property a	ino numan nealm wali Harm	IX.	大学		
Release		Minor			
OR Actual					
Potential			Percent 0%		
			ente de maras		
>>Programmatic Matrix		Section 2			
Falsification	Major Moderate	Minor	D-11111		
	<u> </u>		Percent 25%		
Matrix Notes	100% of the	rule requirement was n	ot met.		
				500	
	in a contract of the contract		Adjustment \$7	500	
				\$2,500	
Violation Events					
Number of Vic	olation Events 1	547	Number of violation days		
	I Adio Soli				
	daily monthly				
mark only one	quarterly		Violation Base Per	alty \$2,500	
with an x	semiannual		.,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	annual				
	single event x				
	No.				
	One sin	gle event is recommend	led.		
Economic Benefit (FB) for thi	Economic Benefit (EB) for this violation Statutory Limit Test				
The control of the co	, juga 200 april 190 april 190 April 190 april 190	047	Til Egypter hand die Alle Coll (F. Colle ex paid forder basic Til Erope van Erope deliche voor die Til Erope deliche en basic bestelle van de Armania.		
Estimated	d EB Amount	\$17	Violation Final Penalty T	otal \$5,150	
		This violation Final As	sessed Penalty (adjusted for lin	nits) \$5,150	
			en de la companya de		

Date Required \$ 28-Dec-2005		0.0 0.0 0.0 0.0 0.0 0.0		Percent Interest 5.0 Onetime Costs \$0 \$0 \$0 \$0 \$0 \$0	Years of Depreciation 1: EB Amount \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Date Required \$	Final Date	0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	SO SO SO
Date Required \$	Final Date	0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	SO SO SO
Date Required \$	Final Date	0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	SO SO SO
	Final Date	0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	SO SO SO
	Final Date	0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
	Final Date	0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
		0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
	24-Sep-2007	0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0
28-Dec-2005	24-Sep-2007	0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0
28-Dec-2005	24-Sep-2007	0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0
28-Dec-2005	24-Sep-2007	0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0
28-Dec-2005	24-Sep-2007	0.0 0.0 0.0 0.0	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0
28-Dec-2005	24-Sep-2007	0.0	\$0 \$0	\$0 n/a	\$0
28-Dec-2005	24-Sep-2007	0.0	\$0	n/a	
28-Dec-2005	24-Sep-2007	0.0			
28-Dec-2005	24-Sep-2007			l n/a	\$0
		∏ 1.7	\$17	n/a	\$17
	11	0.0	\$0	Maria n/a a com	\$0
		0.0	\$0	n/a	\$0
		0.0	\$0	n/a	\$0
ort was due. Revise	ed certification was trainin	s submitte g was cor	d on June 28, 20 mpleted.	y and on time. Date 07. Final date is the	date when the
NUALIZE [1] avoid	led costs before				
					\$0
					\$0
					\$0
-					\$0 \$0
_					\$0 \$0
	 				\$0 \$0
N	UALIZE [1] avoid			UALIZE [1] avoided costs before entering item (except for 0.0 \$0.0 \$0 0.0 \$0 0.0 \$0 0.0 \$0 0.0 \$0 0.0 \$0.0 \$0 0.0 \$0 0.0 \$0 0.0 \$0 0.0	UALIZE [1] avoided costs before entering item (except for one-time avoided of the costs befor

\$200

Approx. Cost of Compliance

TOTAL

\$17

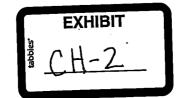
Compliance History

Customer/Respondent/Owner-Operator:

Regulated Entity:

ID Number(s):

CN600132856 S	Solutia Inc.	Classification: AVERAGE	Rating: 2.31
RN100238682	CHOCOLATE BAYOU PLANT	Classification: AVERAGE	Site Rating: 1.61
AIR OPERATING PE	RMITS	ACCOUNT NUMBER	BL0038U
AIR OPERATING PE	RMITS	PERMIT	1258
AIR OPERATING PE	RMITS	PERMIT	2317
AIR OPERATING PE	RMITS	PERMIT	2318
AIR OPERATING PE	RMITS	PERMIT	2319
AIR OPERATING PE	RMITS	PERMIT	2320
AIR OPERATING PE	RMITS	PERMIT	2321
AIR OPERATING PE		PERMIT	2322
AIR OPERATING PE		PERMIT	2323
AIR OPERATING PE	•	PERMIT	2324
AIR OPERATING PE		PERMIT	2325
PUBLIC WATER SYS		REGISTRATION	0200049
	STEW/SOFFET	PERMIT	WQ000001000
WASTEWATER			
WASTEWATER		PERMIT	TPDES0003875
WASTEWATER		PERMIT	TX0003875
AIR NEW SOURCE F		REGISTRATION	83875
AIR NEW SOURCE F		PERMIT	2271
AIR NEW SOURCE F		PERMIT	3046
AIR NEW SOURCE F	PERMITS	PERMIT	5065
AIR NEW SOURCE F	PERMITS	PERMIT	5084
AIR NEW SOURCE F	PERMITS	PERMIT	5336
AIR NEW SOURCE F	PERMITS	PERMIT	6534
AIR NEW SOURCE F	PERMITS	PERMIT	8372
AIR NEW SOURCE F	PERMITS	PERMIT	14488
AIR NEW,SOURCE F	PERMITS	PERMIT	18130
AIR NEW SOURCE F	PERMITS .	PERMIT	18251
AIR NEW SOURCE F		PERMIT	28694
AIR NEW SOURCE F		PERMIT	32151
AIR NEW SOURCE F		PERMIT	34029
AIR NEW SOURCE F		PERMIT	38336
AIR NEW SOURCE F		PERMIT	38998
AIR NEW SOURCE F		PERMIT	39171
AIR NEW SOURCE F		PERMIT	39643
AIR NEW SOURCE F		PERMIT	48895
AIR NEW SOURCE F		ACCOUNT NUMBER	BL0038U
AIR NEW SOURCE F		REGISTRATION	75639
AIR NEW SOURCE F		REGISTRATION	76211
AIR NEW SOURCE F		AFS NUM	4803900009
AIR NEW SOURCE F	PERMITS	REGISTRATION	71232
AIR NEW SOURCE F	PERMITS	EPA ID	PSDTX307A
AIR NEW SOURCE F	PERMITS	REGISTRATION	71063
AIR NEW SOURCE F	PERMITS	EPA ID	PSDTXP910
AIR NEW SOURCE F	PERMITS	REGISTRATION	72689
AIR NEW SOURCE F	PERMITS	REGISTRATION	72545
AIR NEW SOURCE F	PERMITS	REGISTRATION	74040
AIR NEW SOURCE F		REGISTRATION	73707
AIR NEW SOURCE F		REGISTRATION	74788
AIR NEW SOURCE F		REGISTRATION	75318
AIR NEW SOURCE F		REGISTRATION	77064
AIR NEW SOURCE F		REGISTRATION	77079
AIR NEW SOURCE F		REGISTRATION '	
AIR NEW SOURCE F		REGISTRATION	78148
AIR NEW SOURCE F			78728
		REGISTRATION	79253
AIR NEW SOURCE F		REGISTRATION	80379
AIR NEW SOURCE F		REGISTRATION	80616
AIR NEW SOURCE F		REGISTRATION	83109
RADIOACTIVE WAS		LICENSE	RW0219
UNDERGROUND IN.		PERMIT	WDW013
UNDERGROUND IN.	JECTION CONTROL	PERMIT	WDW224
UNDERGROUND IN.	JECTION CONTROL	PERMIT	WDW318
HNDERGROUND IN	JECTION CONTROL	PERMIT	WDW326
CHDENCINO CHD 1140		. =	



WDW002 PERMIT UNDERGROUND INJECTION CONTROL UNDERGROUND INJECTION CONTROL PERMIT WDW001 TXD001700806 INDUSTRIAL AND HAZARDOUS WASTE EPA ID PROCESSING SOLID WASTE REGISTRATION # 30138 INDUSTRIAL AND HAZARDOUS WASTE (SWR) GENERATION INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD001700806 GENERATION TXR05O891 STORMWATER PERMIT LICENSE 0200049 WATER LICENSING INDUSTRIAL AND HAZARDOUS WASTE **PERMIT** 50189 COMPLIANCE PLANS 30138 SOLID WASTE REGISTRATION # IHW CORRECTIVE ACTION (SWR) INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50189 POST CLOSURE PERMIT 50189 INDUSTRIAL AND HAZARDOUS WASTE STORAGE INDUSTRIAL AND HAZARDOUS WASTE **PERMIT** 50189 STORAGE Rating Date: 9/1/2007 Repeat Violator: NO FM 2917, ALVIN, TX, 77512

Location:

TCEQ Region:

Compliance Period:

REGION 12 - HOUSTON

January 23, 2008

Date Compliance History Prepared:

Agency Decision Requiring Compliance History:

Enforcement

September 10, 2002 to September 10, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

NHameed

Phone:

713-767-3629

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

Yes

2. Has there been a (known) change in ownership of the site during the compliance period?

No

3. If Yes, who is the current owner?

N/A

4. if Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

N/A

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 10/10/2003

ADMINORDER 2002-0174-AIR-E

Classification: Moderate

30 TAC Chapter 113, SubChapter C 113,120

30 TAC Chapter 116, SubChapter B 116,115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382,085(b)

Ramt Prov:

SC 2 PERMIT

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak from the heat exchangers into the water of cooling towers E379CT3, E379CT4, and

70382EG.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.120(b)(9)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to notify the TCEQ in writing 30 days in advance of seal gap measurements taken in affiliation with the 1999, 2000, and 2001 annual external floating roof tank inspection of tanks 332T1-1 and

332T1-2.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.133(d)

5C THC Chapter 382, SubChapter A 382.085(b)

SC 2 PERMIT

Description: Failure to adequately conduct the 2001 seal gap measurements and generate raw data and

calculations relating to external floating roof tank 332T1-1.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: SC5C PERMIT

Description: Failure to conduct stack testing of incinerator 55H2 within 60 days of start-up of the facilities.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.152(c)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete periodic report. Specifically, the periodic report submitted on April 25, 2000 for the October 1999 to March 2000 reporting period did not reference or include data

pertaining to incinerator EPN 55H2.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.118(f)(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit complete periodic reports.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)(1)

40 CFR Part 63, Subpart G 63.120(d)(2)(i) 40 CFR Part 63, Subpart G 63.122(b)

Rgmt Prov:

SC2 PERMIT

Description: Failure to have an adequate monitoring plan for absorbers 320S322-1 and 320S322-2, that

ensures the absorbers are being properly operated and maintained.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: Not specified PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rates Table (MAERT) contained in TCEQ Air Permit No. 38336 for waste heat boiler EPN 70Z401 by emitting VOCs at 9.52 pounds per hour

(lbs./hr) when the permitted limit is 8.89 lbs./hr.

Effective Date: 02/20/2006

ADMINORDER 2005-0555-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit #39171, SC#4 PA

Description: Equistar failed to close the automatic inlet valve to the incinerator.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1 09/20/2002 (157060)2 10/08/2002 (13170)3 10/21/2002 (157063)4 11/19/2002 (13812)5 11/22/2002 (157067)6 12/03/2002 (9849)12/10/2002 (16608)8 12/11/2002 (15178)

9 12/27/2002 (157071)

9 12/2//2002 (15/0/1)

10 01/23/2003 (157075)

11 01/31/2003 (22887)

12 02/07/2003 (9887)

13 02/12/2003 (24271)

14 02/18/2003 (24434)

15 02/21/2003 (157034) 16 02/26/2003 (26108)

17 02/26/2003 (25864)

18 02/26/2003 (26050)

19	02/26/2003	(25856)
20	02/26/2003	(26041)
21	02/26/2003	(25983)
22	02/26/2003	(25859)
23	02/26/2003	(26112)
24	02/26/2003	(25851)
25	02/26/2003	(25988)
26	02/26/2003	(25854)
27	02/26/2003	(26078)
28	02/27/2003	(24374)
29	03/04/2003	(23648)
30	03/12/2003	(27234)
31	03/21/2003	(157037)
32	03/28/2003	(28455)
33	04/21/2003	(157042)
34	05/20/2003	(37989)
35	05/21/2003	(157046)
36	06/20/2003 07/01/2003	(157050) (36597)
37	07/01/2003	(36597)
38 39	08/14/2003	(148336)
40	08/14/2003	(148343)
41	08/19/2003	(149876)
42	08/21/2003	(151361)
43	08/21/2003	(151374)
44	08/25/2003	(151674)
45	08/25/2003	(294923)
46	09/11/2003	(248057)
47	09/11/2003	(248048)
48	09/23/2003	(294925)
49	10/21/2003	(294927)
50	10/27/2003	(281097)
51	10/29/2003	(253450)
52	10/29/2003	(253464)
53	11/12/2003	(253266)
54	11/12/2003	(252275)
55	11/21/2003	(294928)
56	11/25/2003	(255837)
57	11/25/2003	(255830)
58	11/25/2003	(250820)
59	11/25/2003	(255834)
60	11/25/2003	(255835)
61	12/02/2003	(255621)
62	12/18/2003	(257385)
63	12/18/2003	(257514)
64	12/23/2003	(294929)
65	01/12/2004	(258960)
66	01/12/2004	(258944)
67	01/16/2004	(255951)
68	01/23/2004	(294931)
69	02/23/2004	(294912)
70	02/26/2004	(255896)
71	02/27/2004	(262913)
72	02/27/2004	(262943)
73	02/27/2004	(263910)
74	02/27/2004	(262933)
75	02/27/2004	(262947)
76	02/27/2004	(262922)
77 70	03/22/2004	(294915)
78 70	03/29/2004	(267307)
79	03/30/2004	(332762)
80	04/12/2004	(253529)
81 82	04/13/2004	(265167)
82 83	04/16/2004 04/20/2004	(267638)
84	05/25/2004	(294916) (294918)
85	06/17/2004	(273007)
86	06/21/2004	(294920)
00	3012112004	(204020)

87 0	7/23/2004	(351912)
88 0	7/30/2004	(284372)
89 0	8/03/2004	(283906)
	8/19/2004	(351913)
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	8/31/2004	(271365)
	9/01/2004	(271988)
93 0	9/01/2004	(270694)
94 0	9/01/2004	(272089)
95 0	9/01/2004	(289574)
96 0	9/20/2004	(351914)
97 0	9/23/2004	(334052)
98 0	9/23/2004	(334055)
	0/13/2004	(337045)
	0/13/2004	(337038)
	0/22/2004	(351915)
	0/22/2004	(351918)
	1/03/2004	(333514)
104 1	1/03/2004	(333511)
105 1	1/04/2004	(351917)
106 1	1/05/2004	(338995)
107 1	1/05/2004	(337520)
108 1	1/16/2004	(334879)
	1/16/2004	(340676)
	1/16/2004	(340661)
	1/16/2004	(339730)
	1/16/2004	(340570)
113 1	1/17/2004	(340850)
114 1	1/22/2004	(340787)
115 1	1/23/2004	(341009)
116 1	2/09/2004	(343333)
117 1	2/09/2004	(343311)
118 1	2/10/2004	(263071)
	2/10/2004	(260541)
	2/10/2004	(263070)
	2/13/2004	(262649)
	2/14/2004	(343317)
123 1	2/14/2004	(343284)
124 1	2/15/2004	(351916)
125 1	12/16/2004	(336194)
126 1	12/17/2004	(344033)
127 1	2/20/2004	(338296)
128 1	12/20/2004	(335252)
129 1	2/20/2004	(338265)
	2/22/2004	(381756)
	12/23/2004	(336768)
	2/28/2004	(344974)
	12/30/2004	(343622)
134 1	12/30/2004	(345394)
135 (01/03/2005	(343620)
136 (1/03/2005	(343624)
137 (01/14/2005	(345345)
138	2/14/2005	(349294)
	02/14/2005	(348976)
	02/21/2005	(349363)
	02/22/2005	(381755)
	02/24/2005	(349397)
	02/28/2005	(347701)
	03/24/2005	(419586)
	04/04/2005	(349690)
146 (04/06/2005	(376386)
	04/06/2005	(376392)
147 ((310332)
	04/06/2005	(376398)
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148 (149 (150 (151 (04/06/2005 04/06/2005 04/06/2005 04/06/2005	(376398) (376425) (376432) (376403)
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163 06/13/2005 (345346)	
164 06/23/2005 (419589)	
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166 07/19/2005 (440731)	
167 07/21/2005 (398102)	
168 08/16/2005 (440732)	
169 08/19/2005 (404318))
170 08/24/2005 (377022))
171 08/24/2005 (405509))
172 08/24/2005 (349399))
173 08/24/2005 (405513))
174 08/25/2005 (401920)	
175 08/29/2005 (401919)	
176 08/30/2005 (401906)	
177 09/01/2005 (401916)	
178 09/19/2005 (440733)	
179 10/04/2005 (379884)	
180 10/11/2005 (399217))
181 10/21/2005 (433182))
182 10/21/2005 (433183))
183 10/24/2005 (468248)
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186 12/20/2005 (439435	•
187 12/20/2005 (468250	•
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188 12/30/2005 (434386	
189 01/09/2006 (439878	•
190 01/23/2006 (468251)
191 01/24/2006 (440227)
192 01/24/2006 (440219)
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194 02/14/2006 (453399)
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200 04/17/2006 (460779	
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212 05/18/2006 (449724	•
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217 05/31/2006 (466932	
218 06/05/2006 (463415	•
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220 06/21/2006 (480974	l)
221 06/23/2006 (498078	3)
222 06/29/2006 (482600))

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223	06/29/2006	(482575)
224	06/29/2006	(466692)
225	07/10/2006	(464446)
226	07/20/2006	(467521)
227	07/25/2006	(485504)
228	07/26/2006	(520095)
229	08/17/2006	(497124)
230	08/21/2006	(520096)
231	08/23/2006	(486778)
232	08/31/2006	(480128)
233	09/15/2006	(511153)
234	09/21/2006	(520097)
235	10/23/2006	(544349)
		(544349)
236	10/27/2006	,
237	10/27/2006	(516053)
238	11/08/2006	(518116)
239	11/29/2006	(531921)
240	11/29/2006	(532004)
241	11/29/2006	(544350)
242	12/07/2006	(532264)
243	12/08/2006	(531936)
244	12/11/2006	(518239)
245	12/11/2006	(518235)
246	12/27/2006	(544351)
247	01/11/2007	(532283)
248	01/18/2007	(535916)
249	01/18/2007	(536107)
250	01/22/2007	(544352)
251	01/23/2007	(536763)
252	01/30/2007	(536987)
253	01/30/2007	(536993)
254	02/16/2007	(539392)
		(539392)
255	02/16/2007	
256	02/16/2007	(512464)
257	02/20/2007	(539401)
258	02/21/2007	(539360)
259	02/22/2007	(539395)
260	02/22/2007	(575043)
261	02/23/2007	(539396)
262	03/12/2007	(539403)
263	03/12/2007	(539397)
264	03/12/2007	(539398)
265	03/26/2007	(575044)
266	04/12/2007	(543396)
267	04/12/2007	(543389)
268	04/12/2007	(543359)
269	04/12/2007	(543411)
270	04/12/2007	(543393)
271	04/19/2007	(575045)
272	05/23/2007	(575046)
273	06/08/2007	(543508)
274	06/13/2007	(563309)
275	06/25/2007	(575047)
276	06/26/2007	(558363)
277	07/05/2007	(565543)
278	07/05/2007	(564044)
279	07/06/2007	(560348)
280	07/23/2007	(575048)
281	08/17/2007	(571117)
282	08/17/2007	(571120)
283	08/17/2007	(571122)
284	08/17/2007	(571113)
285	08/17/2007	(571116)
286	08/22/2007	(573057)
287	08/28/2007	(566965)
288	08/28/2007	(566968)
289	08/29/2007	(572199)
290	08/30/2007	(571497)
200	55,50/200/	(3, 1431)

Date: 09/30/2002 (157063)

Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1)

Citation: TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

Date: 12/03/2002 (9849)

Classification: Minor Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

failed to conduct audio, olfactory, and visual checks for Hydrogen Fluoride (HF) Description: leaks within the operating area for both the shifts (day and night) on September 29, 2002 and the day shift on July 22, 2002 as required by their TCEQ Air Permit

No. 6534, Special Condition (SC) 13 A.

Self Report?

Classification: Minor

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

failed to record pH values of caustic scrubber liquor effluent on 8/28/00, 9/4/00, Description: 10/31/00, 11/11/00, 11/13/00, 11/14/00, 12/28/00, 2/20/01, 3/6/01,

4/18/01,6/17/01, 6/18/01, 7/27/01, 7/28/01, 8/01/01, and 10/4/01 as required by

their TCEQ Air Permit No. 6534, Special Condition (SC) 4.

(142104) Date: 12/27/2002

Classification: Moderate Self Report?

Citation:

30 TAC Chapter 113, SubChapter C 113.120 Description: SOCMI-VNTS. VESSL.,WW

(157034) Date: 01/31/2003

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

Date: 07/31/2003 (294923)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter Description:

Date: 10/31/2003 (294928)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

Date: 03/30/2004 (332762)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 305, SubChapter F 305.125(17)

Description: NON-RPT VIOS FOR MONIT PER OR PIPE

Date: 05/31/2004 (294920)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

(339730)Date: 11/16/2004

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT 18251 and N-011, S.C No. 4 Description: Failure to operate the flare within MAERT limits

Date: 11/17/2004 (340850)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT 18251, S.C No.4 Ramt Prov:

Failure to prevent the leaks from the valves 30HIC4-A/B and caused the release of Description:

air contaminants from the emission point which is not listed in the MAERT.

Date: 11/18/2004 (341009)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: PERMIT 18251, S.C. No.4

Description: Failure to prevent tripping of the boiler (30H5) and relit the burners in a timely

manner and caused the release of air pollutants from the emission point that was

not listed in the MAERT.

Date: 11/22/2004

(340787)

Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(1)

Citation: Description:

Citation:

Failure to to submit the initial notification of the emissions event within 24 hours

after the start of incident.

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT 32151, S.C. No.1

Description:

Failure to limit the emissions from the scrubber within the MAERT limits.

Date: 12/13/2004

(262649)

Self Report?

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

PA TCEQ Air Permit No. 18251, SC #4

Description:

Solutia failed to prevent moisture from entering the igniter unit on the flare.

Date: 12/20/2004

(335252)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

5C THC Chapter 382, SubChapter A 382.085(b) PA TCEQ Air Permit #18251, SC #1

Rqmt Prov: Description:

Sterling Chemicals failed to prevent external corrosion on a pipeline.

Date: 12/31/2004

(351918)

Classification:

Moderate

Moderate

Minor

Moderate

Moderate

Minor

Moderate

Moderate

Moderate

Moderate

Self Report? Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26,121(a)

Description: Date: 01/03/2005

Self Report?

Failure to meet the limit for one or more permit parameter (343620)

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Ramt Prov:

5C THC Chapter 382, SubChapter A 382.085(b) PA TCEQ Air Permit No. 38336, SC #4

Description:

Solutia inadvertently sent steam through the drain line to the process sewer

increasing the pressure in the process sewer tank.

Self Report? Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

Description:

Failure to report an emissions event (Incident #45511) that occurred at the AN7

Unit in a timely manner. (348976)

Date: 02/14/2005

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Citation: Description:

Solutia failed to prevent a fire suppression discharge which resulted in a release of

145 pounds (lbs) of Halon 1301 (bromotrifluoromethane).

Date: 04/04/2005

(349690)

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Citation:

The regulated entity failed to prevent a shutdown of the AN2 waste heat boiler due

to the malfunction of the valve positioner.

Self Report? NO

Citation: Description: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Solutia, Inc., - Chocolate Bayou Plant failed to identify on the emissions event

report the permit number authorization.

(377022)

Date: 07/21/2005

(398102)

Self Report?

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov:

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT TCEQ Permit #18251, SC #4

Description:

Solutia failed to include the facility's authorization limit and number on the final

Classification: Minor

report. Self Report?

NO

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Solutia failed to include the facility's authorization limit and number on the final

Date: 08/24/2005

Classification:

Self Report? Citation:

Citation:

Description:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: PERMIT 18251 SC 4

Solutia failed to properly tighten a valve. Description:

Date: 08/24/2005 (349399)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

PA TCEQ Air Permit No. 38998, SC#4 Ramt Prov:

The regulated entity failed to prevent a leak in a propylene pump. Description:

Minor Self Report? Classification:

30 TAC Chapter 101, SubChapter F 101.201(b)(8) Citation:

failed to identify the permit number representing the propylene pump in the Description:

emissions event report.

Date: 09/30/2005 (468248)

Self Report?

Citation:

Classification:

Moderate

Moderate

Classification:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter Description:

(468249) Date: 10/31/2005

Self Report? Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

Date: 02/16/2006 (405519)

Classification: Moderate Self Report?

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B) Citation:

Description: Failure to record quarterly opacity observation on Unit ID: 350H1-1

Classification: Moderate Self Report?

30 TAC Chapter 115, SubChapter B 115,142(1)(E) Citation:

Description: Solutia, Inc., failed to equipt Unit IDs:P-10 and P-13, with a Close-Vent system.

Date: 02/17/2006 (405519)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation: Rgmt Prov: **PERMIT O-02325**

Failure to comply with the requirements of 30 TEX. ADMIN. CODE Chapter Description:

106.472(9).

Date: 03/02/2006 (457603)

Classification: Moderate Self Report?

30 TAC Chapter 113, SubChapter C 113.120 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT SC 2

Failure to have a monitoring plan that indicates the monitoring parameter levels Description:

that constitute a leak from the heat exchangers into the water of cooling towers

E379CT3, E379CT4, and 70382EG.

Classification: Major Self Report? NO

Citation: 2A TWC Chapter 7, SubChapter A 7.101

ORDER Ordering Provision 3.a. Ramt Prov: Failure to comply with ordering provisions of the Commission Order Docket No.

Description: 2002-0174-AIR-E.

Date: 07/25/2006 (485504)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PERMIT No. 18251, Special Condition 4

Failure to prevent unauthorized emissions. Description: Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.221(a)

Failure to maintain the AN2 Flare in good working order during facility operations. Description:

Date: 07/31/2006 (520096)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a) Description: Failure to meet the limit for one or more permit parameter

Date: 08/31/2006 (520097)

Classification: Self Report? Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 08/31/2006

Classification:

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Failure to maintain the tank throughputs for the acetic tank and water circulating Description:

tank as represented in the permit application dated February 29, 2000 for the

Moderate

Minor

Moderate

Moderate

Classification:

Classification:

TCEQ Permit no. 38336.

Self Report? 30 TAC Chapter 115, SubChapter D 115.352(4) Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

PERMIT 38336, Special Condition 23.E Ramt Prov:

OP O-02324, Special Condition 18 OP O-02324, Special Condition 1A

Description:

Failure to install caps/plugs/flanges on eight open-ended lines in unit 70ANFUG. Classification: Self Report?

30 TAC Chapter 115, SubChapter D 115.352(2) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov: OP O-02324, Special Condition 1A

Description:

Failure to conduct a first attempt at repair on 1 valve within five calendar days after

a leak was detected in the AN 7 Unit.

Self Report? Classification: Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov: PERMIT 38336, Special Condition 12B OP O-02324, Special Condition 18

Description: Failure to maintain three pilots on the flare 70Z522.

Classification: Self Report?

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

PERMIT 38336, Special Condition 4 Rqmt Prov:

PERMIT 38336, Special Condition 8A OP O-02324, Special Condition 18

Failure to maintain the NOx emissions from the boiler 70Z401 within the permit Description:

limit in the AN7 Unit.

Date: 11/29/2006 (532004)

Self Report?

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: PERMIT No. 38998, Special Condition 4 Description: Failure to prevent unauthorized emissions.

Date: 12/31/2006 (544352)

Classification: Self Report? YES Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter

Description:

Date: 02/16/2007 (512464)

Self Report? Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

OP FOP O-02321, SC 12 Rqmt Prov:

OP FOP O-02321, SC 1A PA NSR 18251 SC 14E PA NSR 18251, SC 12E

Description: Failure to cap 10 open-ended lines in HRVOC and HAP service.

Date: 02/21/2007 (539360)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 331, SubChapter D 331.63(e)

PERMIT PROVISION VII.D. Rqmt Prov:

Violation of maximum injection flow rate. Description:

Date: 08/31/2007 (607508) Self Report?

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Citation:

Failure to meet the limit for one or more permit parameter

Classification:

Moderate

Environmental audits.

Notice of Intent Date:

09/23/2004

(347742)

No DOV Associated

Notice of Intent Date: 01/03/2006 (453378)

(462917)

No DOV Associated

04/07/2006

Notice of Intent Date: No DOV Associated

05/25/2006 Notice of Intent Date:

(481532)

Disclosure Date:

11/14/2006

Viol. Classification: Minor

Rgmt Prov: PERMIT 32151, SC 8A

Description:

Failure to notify the regional office 45 days prior to schedule stack sampling for scrubber 83S14 and 83S6.

Notice of Intent Date:

04/23/2007

(559025)

No DOV Associated

Type of environmental management systems (EMSs). G.

Voluntary on-site compliance assessment dates. Н.

Participation in a voluntary pollution reduction program.

N/A

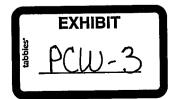
Early compliance.

N/A

Sites Outside of Texas

N/A

3	tember 2002)					CW) PCW Revision Se	eptember 19, 200
ES Assigned	22-Oct-2007			Charles (Architect	1a 1 26,91 A	The Season to Antonio.	
ES Assigned PCW		Screenin	g 29-Oct-2007	EPA Due	Buffer out office Lauren		
PONDENT/FACILITY	INFORMATION	The state of the s		1 4 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
Respondent	Solutia Inc.						
Reg. Ent. Ref. No.	RN100238682			Major	Minor Course	Major	
Facility/Site Region	12-Houston				Minor Source	Iviajoi	
E INFORMATION	04000	4.14.1		4			
Enf./Case ID No.	2008-0062-AIR-	·E		- NO.	of Violations Order Type		
Media Program(s)				Ent	. Coordinator	Kimberly Morales	
Multi-Media	L		Marrian	£10,000	EC's Team	EnforcementTeam 5	
Admin. Penalty \$ I	Limit winimumi	\$0	Maximum	\$10,000	······································		
		Pena	alty Calcul	ation Sec	tion		
AL BASE PENAL	_TY (Sum of v			and the second second		Subtotal 1	\$2,60
			-acc bollain		auth Millionaid Tolonoolia		yano
USTMENTS (+/-) Subtotals 2-7 are obtain			Penalty (Subtotal 1) h	w the indicated ne	centace		
Compliance Histo		i Tuai base i		6 Enhancement		otals 2, 3, & 7	\$3,64
			due to two 1660 a		13 same or	work e.2.9 emention to miles to the Se	
Notes			-similar NOVs of alty reduction for			'	
	eniueni violati		isclosure of Viola		alis and one		
ingel 1973 Hariotza (marti ingelese ekonomisa)		on a separation of		Companyation and a single	et aga men menanga proposaga salam	I	
Culpability	No [. 21 (44 July 187)	0%	6 Enhancement		Subtotal 4	\$
Notes	The Re	spondent	does not meet th	ne culpability cr	teria.		
					to a sum of the	· .	
Control Patella Person			400/				
Good Faith Eπor	t to Comply	NOV to EDE	10%	and the communication of the contract of the		Subtotal 5	\$26
Good Faith Εποη Extraordinary	t to Comply Before NOV	NOV to EDF	PRP/Settlement Offer	and completely an experience and an experience of the		Subtotal 5	\$26
Extraordinary Ordinary	Before NOV	x	Branch Consultation of the control of the second and the second of the s	and completely an experience and an experience of the		Subtotal 5	\$26
Extraordinary	Before NOV	X (mark with x)	PRP/Settlement Offer	and the second s	avember 0	Subtotal 5	\$26
Extraordinary Ordinary	Before NOV	X (mark with x)	Branch Consultation of the control of the second and the second of the s	and the second s	ovember 9,	Subtotal 5	\$26
Extraordinary Ordinary N/A	Before NOV	X (mark with x)	eted the corrective 2007.	ve actions on N	ovember 9,		
Extraordinary Ordinary N/A	Before NOV The Respond	x (mark with x) ent comple	eted the corrective 2007.	/e actions on N	ar ar Philippelly, the	Subtotal 5	
Extraordinary Ordinary N/A Notes	Before NOV	X (mark with x)	eted the corrective 2007.	ve actions on N	ar ar Philippelly, the		
Extraordinary Ordinary N/A Notes Approx. 0	The Respond Total EB Amounts Cost of Compliance	x (mark with x) ent comple \$10	eted the corrective 2007.	/e actions on N	Amount	Subtotal 6	\$
Extraordinary Ordinary N/A Notes	The Respond Total EB Amounts Cost of Compliance	x (mark with x) ent comple \$10	eted the corrective 2007.	/e actions on N	Amount		\$
Extraordinary Ordinary N/A Notes Approx. 0 1 OF SUBTOTALS	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M.	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	/e actions on N	Amount	Subtotal 6	\$ \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 1 OF SUBTOTALS	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M.	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	ve actions on N Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$ \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 1 OF SUBTOTALS	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M.	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	ve actions on N Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$ \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 I OF SUBTOTALS IER FACTORS AS es or enhances the Final Si	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M.	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	ve actions on N Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$5,98 \$5
Extraordinary Ordinary N/A Notes Approx. 0 I OF SUBTOTALS IER FACTORS AS es or enhances the Final Si	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M.	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	ve actions on N Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$5,98 \$5
Extraordinary Ordinary N/A Notes Approx. 0 I OF SUBTOTAL: BER FACTORS AS es or enhances the Final S Notes	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M. ubtotal by the indicate	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	ve actions on N Enhancement* d at the Total EB \$	Amount Final Pel	Subtotal 6 Final Subtotal Adjustment	\$5,98 \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 I OF SUBTOTALS IER FACTORS AS es or enhances the Final S	The Respond Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M. ubtotal by the indicate	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007.	ve actions on N Enhancement* d at the Total EB \$	Amount Final Pel	Subtotal 6	\$5,98 \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 I OF SUBTOTAL: IER FACTORS As es or enhances the Final Si Notes TUTORY LIMIT A	Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M. ubtotal by the indicate	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007. **Cappe** UIRE e.	ve actions on N Enhancement d at the Total EB \$	Amount Final Per Final Asse	Subtotal 6 Final Subtotal Adjustment	\$5,98 \$5,98
Extraordinary Ordinary N/A Notes Approx. Of OF SUBTOTALS IER FACTORS AS es or enhances the Final Si Notes TUTORY LIMIT A	Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M. ubtotal by the indicate	x (mark with x) ent comple \$10 \$1,000	eted the corrective 2007. **Cappe** UIRE e.	ve actions on N Enhancement d at the Total EB \$	Amount Final Per Final Asse	Subtotal 6 Final Subtotal Adjustment nalty Amount ssed Penalty	\$5,98 \$5,98 \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 I OF SUBTOTAL: IER FACTORS As es or enhances the Final Si Notes TUTORY LIMIT A	Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M. ubtotal by the indicate	X (mark with x) ent comple \$10 \$1,000 AY REQ ed percentage	eted the corrective 2007. **Cappe** UIRE e.	ve actions on N Enhancement d at the Total EB \$ 0% g. 20 for 20% redu	Final Per Final Asse Reduction	Subtotal 6 Final Subtotal Adjustment nalty Amount ssed Penalty	\$5,98 \$5,98
Extraordinary Ordinary N/A Notes Approx. 0 Approx. 0	Total EB Amounts Cost of Compliance S 1-7 S JUSTICE M. ubtotal by the indicate	X (mark with x) ent comple \$10 \$1,000 AY REQ ed percentage	eted the corrective 2007. **Cappe UIRE e.	ve actions on N Enhancement d at the Total EB \$ 0% g. 20 for 20% redu	Final Per Final Asse Reduction	Subtotal 6 Final Subtotal Adjustment nalty Amount ssed Penalty	\$5,98 \$5,98 \$5,98



Docket No. 2008-0062-AIR-E

PCW

Respondent Solutia Inc.

Case ID No. 34886

Reg. Ent. Reference No. RN100238682

Media [Statute] Air

Enf. Coordinator Kimberly Morales

Policy Revision 2 (September 2002)

PCW Revision September 19, 2007

Compliance History Worksheet

l l	ent Number of		
NOV		n 13	65%
	Other written NOVs	21	42%
	Any agreed final enforcement orders containing a denial of liability (number of order meeting criteria)	2	40%
Order	Any adjudicated final enforcement orders, agreed final enforcement orders without a deni- of liability, or default orders of this state or the federal government, or any final prohibitor emergency orders issued by the commission		0%
Judgme			0%
and Con Decree	LAny adjudicated final court judgments and default judgments, or non-adjudicated final cou		0%
Convicti		0	0%
Emissio	Chronic excessive emissions events (number of events)	0	0%
Audit	Letters notifying the executive director of an intended audit conducted under the Texa Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		-5%
7.001.	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privileg Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	e 1	-2%
	Pie	ease Enter Yes or N	lo
	Environmental management systems in place for one year or more	No	0%
Othe	Voluntary on-site compliance assessments conducted by the executive director under special assistance program	a No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	nt No	0%
	-	Percentage (Subtotal 2)
epeat Violato	(Subtotal 3)		frish i
	No Adjustment	Percentage (Subtotal 3)
ompliance Hi	story Person Classification (Subtotal 7)		
Avera	ge Performer Adjustment	Percentage (Subtotal 7)
ompliance His	story Summary		
Complia Histor Note:	y of which 10 were self-reported effluent violations. Penalty reduction for 5 Notice of Au		5

		ening Date			D	ocket No. :	2008-0062	-AIR-E		/ PCW
	F	Respondent	Solutia Inc.						Policy R	evision 2 (September 2002)
		Case ID No.							PCW Re	evision September 19, 2007
Reg.		ference No.		2						
		lia [Statute]								
		Coordinator	Providence of the second	ales	÷			•		
	Viol	ation Number	11							1
		Rule Cite(s)	30 Tex. Adm		16.115(c), Air P x. Health & Saf			al Condition N	lo. 4 and	
	Violatio	n Description	cyanide, Respondent 3 off gas to the system, c	357.4 lbs of a failed to open the Acrylonitricausing an emes (Incident Nate, the demonance)	rized emission: acrylonitrile, and the manual blo ile Unit 2 Waste aissions event v lo. 95610). Sin astrations in 30 ent an affirmativ	d 5 lbs of acro ock valve duri e Heat Boiler I which began o ce this emiss Tex. Admin.	blein were ing crossor resulting in on August ions event Code § 10	released whe ver of Acrylon the over pre 5, 2007, and was avoidat 01.222 neces	en the nitrile Unit essure of lasted for ole and	,
								Base	e Penalty	\$10,000
>> Enviro	nmenta	l, Property a	and Human	Health Mat	trix					
	de printe de la company de address de Constitution (Consti	Martin Barrio A. et a. Indi Maria I Committe Martin a.a.a (in Tabusharran	maalan na maaland orimaala direa sebes 61 oo oo deel babba 2.00	Harm	erious esting to effect the early flow to all a deliberate efficient plan alone of cital dis-	entallini den Mariani (i. i. inpresipalitato), printe entrali intelligi	SACONDA SACONDA MA LA SACA	became and a second		
OR		Release		Moderate	Minor	1				
, UN (2)		Actual Potential			X.	ı	Percent	25%		
1.00		roteittai				'	rercent	25%		,
>>Prograi	mmatic	Matrix	artistististisi		olena Susanis av Santalia					
		Falsification	Major	Moderate	Minor					
						F	Percent	0%		
• 444						` :				1
	Matrix Notes				een exposed to human health violation.					
		Vanadiis as an Ceastail	nangangan sampangan panggangan Mangalah, kalupan sampa sampan			A.2	ljustment		67 E00	
and the second						Au	njustment		\$7,500	
										\$2,500
	u da pagesatura				4.000					
Violation	Events							Patental Control		
		Number of Vic	Nation Evente	1	7 6	1	Uumbar af	violetien dev	_	
		Number of Vic	Diation Events	<u> </u>	lj L	· · · · · · · · · · · · · · · · · · ·	vuilibel of	violation day	5	
			daily monthly						,	
		mark only one with an x	quarterly	X			Vi	olation Base	Penalty	\$2,500
		<i>771.77</i>	semiannual annual							
			single event						,	
					1					
			-				·	13/16]	
				One quar	terly event is re	ecommended.				
					***************************************	·				
Economic	Benefil	(EB) for th	is violation				Statutory	/Limit Tes	t	
		Estimated	d EB Amount		\$7		Violatio	n Final Pena	ity Total	\$5,750
									-	
0-7-186 - 1836 - 18				T.	his violation F	inal Assesse	ed Penalty	(adjusted fo	or limits)[\$5,750
	6803-991-314.00.7		er som stømstådeligt vil	aveniere gerig	amatay, at was sign	sementing at			e arenasini	

	E	conomic	Benefit W	orks	sheet		
Respondent	Solutia Inc.	· Marin I communi	The second second second			la ditumba antific casa a las conte	a di sadi di salimani
Case ID No.							
Reg. Ent. Reference No.					•		
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.		. Barrier i Alzertzenen	- Etter ter soar		man my many may be	and the first start	and the state of the state of
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	is han/a	\$0
Remediation/Disposal				0.0	\$0	u n/a	\$0
Permit Costs				0.0	\$0	i n/a	\$0
Other (as needed)	\$500	5-Aug-2007	9-Nov-2007	0.3	\$7	in/al# + 19	\$7
Notes for DELAYED costs	Estimated cos to the need for	t for changes in pr manual opening o	of these valves. Da	ate requ	nsure that the ope uired is the date of ng was completed.	rators respond in a the emissions eve	timely manner nt. Final date is
Avoided Costs	ANNI	ALIZE [1] avoide	d costs before e	ntering	item (except for	one-time avoided	coete)
Disposal		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	W. 00010: D010: 0: 0	0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0 \$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)			-	0.0	\$0	\$0	\$0
•							
Notes for AVOIDED costs			·				
Approx. Cost of Compliance		\$500		. —	TOTAL		\$7

Screening Date 29-00	:t-2007	Docke	et No. 2008-0062-AIR-E	⊘PCW
Respondent Soluti	a Inc.		. Policy R	evision 2 (September 2002)
Case ID No. 34886			PCW Re	evision September 19, 2007
Reg. Ent. Reference No. RN10	0238682			
Media [Statute] Air				
Enf. Coordinator Kimbe	erly Morales			
Violation Number	2			a
Rule Cite(s)	ex. Admin. Code § 101.	.201(a)(1)(B) and T	ex. Health & Safety Code § 382.085(b)	
	ent (Incident No. 95610) which started and	hours of the discovery of the emissions dended on August 5, 2007. The initial duntil August 8, 2007.	
			Base Penalty	\$10,000
		Secretaria de la composición dela composición de la composición de la composición de la composición dela composición dela composición dela composición de la composición de la composición de la composición de la composición dela composic		
>> Environmental, Property and H	uman Health Wath Harm	X		
Release M	ajor Moderate	Minor		
OR Actual				
Potential			Percent 0%	
	egennetering states over 50% had produce in progress of the 100000 companies of the			
>>Programmatic Matrix	<u> </u>			
Falsification M	ajor Moderate	Minor		
		Х	Percent 1%	
Matrix Notes	At least 70% of	f the rule requireme	ent was met.	
			Adjustment \$9,900	
			Adjustment \$3,300	
				\$100
Violation Events				
	s in a substitution of the	Andreas and Institute and Inst		
Number of Violation	Events 1		Number of violation days	
				
Total Control of the	aily /			
	nthly*			0.400
	rterly		Violation Base Penalty	\$100
i sciiii	annual nual			
■27/75/457.01	event x			
l monay.	6242III			
]
	One singl	e event is recomme	ended.	
Economic Benefit (EB) for this vio	lation	5. 7. A. S.	Statutory Limit Test	
Estimated EB A	mount	\$4]	Violation Final Penalty Total	\$230
	41-	de vieleties Fisci	Annual Danata, /	0000
	10	iis violation Final /	Assessed Penalty (adjusted for limits)	\$230

		conomic	Benefit W	orkst	neet		
Respondent	Solutia Inc.	alle communication of			3 - No. 2 - 1 - 1 - 1 - 1 - 1 - 1	albane and the entire of the first and the entire of the	and the same from
Case ID No.		*					
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	· C	our and one organic	naprijasnja nameliženjami,				
				fa de la compa		5.0	15
	item Cost	Date Required	Final Date	Yrs I	nterest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$		esta de la companya d				
Delayed Costs				T .	grand grand states	ereggi ner nen	
Equipment		-		0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$500	6-Aug-2007	2-Oct-2007	0.2	\$4	n/a	\$4
Remediation/Disposal				0.0	\$0	n/all	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	F-13			0.0	\$0	n/a	\$0
Notes for DELAYED costs	due. Repo	ort was submitted	on August 8, 2007	re submitte . Final date	ed on time. Date	required is the date en the training was c	\$0 the report was completed.
Notes for DELAYED costs Avoided Costs	due. Repo	ort was submitted	on August 8, 2007	e submitte . Final date	d on time. Date e is the date who	required is the date en the training was cone-time avoided cone-ti	\$0 the report was ompleted.
Notes for DELAYED costs Avoided Costs Disposal	due. Repo	ort was submitted	on August 8, 2007	re submitte . Final date	d on time. Date is the date who mem (except for	required is the date en the training was cone-time avoided cone-time	the report was completed.
Notes for DELAYED costs Avoided Costs Disposal Personnel	due. Repo	ort was submitted	on August 8, 2007	re submitte . Final date . final date . final date . final date	ed on time. Date is the date who mem (except for \$0 \$0	required is the date on the training was cone-time avoided cone-ti	the report was completed.
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	due. Repo	ort was submitted	on August 8, 2007	re submitte . Final date	ed on time. Date to is the date who the date	required is the date en the training was cone-time avoided cone-ti	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	due. Repo	ort was submitted	on August 8, 2007	re submitte . Final date ntering ite 0.0 0.0	d on time. Date is the date whe is the date whe is 0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-ti	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	due. Repo	ort was submitted	on August 8, 2007	ntering ite	d on time. Date is the date whe mem (except for \$0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-ti	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	due. Repo	ort was submitted	on August 8, 2007	re submitte . Final date ntering ite 0.0 0.0 0.0 0.0 0.0	d on time. Date is the date whe is the date whe is 0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-ti	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	due. Repo	ort was submitted	on August 8, 2007	ntering ite 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	en (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-time avoided cone-time so	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	due. Repo	ort was submitted	on August 8, 2007	ntering ite 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	en (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-time avoided cone-time so	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	due. Repo	ort was submitted	on August 8, 2007	ntering ite 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	en (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-time avoided cone-time so	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	due. Repo	ort was submitted	on August 8, 2007	ntering ite 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	en (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	required is the date on the training was cone-time avoided cone-time avoided cone-time so	the report was ompleted. osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$

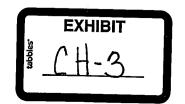
Compliance History

Customer/Respondent/Owner-Operator:

Regulated Entity:

ID Number(s):

CN600132856	Solutia Inc.	Classification: AVERAGE	Rating: 2.31
RN100238682	CHOCOLATE BAYOU PLANT	Classification: AVERAGE	Site Rating: 1.61
AIR OPERATING PE	ERMITS	ACCOUNT NUMBER	BL0038U
AIR OPERATING PE	ERMITS	PERMIT	1258
AIR OPERATING PE	RMITS	PERMIT	2317
AIR OPERATING PE	RMITS	PERMIT	2318
AIR OPERATING PE		PERMIT	2319
AIR OPERATING PE		PERMIT	2320
AIR OPERATING PE		PERMIT	2321
AIR OPERATING PE			
		PERMIT	2322
AIR OPERATING PE		PERMIT	2323
AIR OPERATING PE		PERMIT	2324
AIR OPERATING PE		PERMIT	2325
PUBLIC WATER SY	STEM/SUPPLY	REGISTRATION	0200049
WASTEWATER		PERMIT	WQ000001000
WASTEWATER		PERMIT	TPDE\$0003875
WASTEWATER		PERMIT	TX0003875
AIR NEW SOURCE	PERMITS	PERMIT	2271
AIR NEW SOURCE		PERMIT	3046
AIR NEW SOURCE		PERMIT	5065
AIR NEW SOURCE I		PERMIT	5084 ·
AIR NEW SOURCE I			
		PERMIT	5336
AIR NEW SOURCE I		PERMIT	6534
AIR NEW SOURCE I		PERMIT	8372
AIR NEW SOURCE I		PERMIT	14488
AIR NEW SOURCE I	PERMITS	PERMIT	18130
AIR NEW SOURCE I	PERMITS	PERMIT .	18251
AIR NEW SOURCE I	PERMITS	PERMIT	28694
AIR NEW SOURCE I	PERMITS	PERMIT	32151
AIR NEW SOURCE I	PERMITS	PERMIT	34029
AIR NEW SOURCE	PERMITS	PERMIT	38336
AIR NEW SOURCE		PERMIT	38998
AIR NEW SOURCE I			
AIR NEW SOURCE I		PERMIT	39171
		PERMIT	39643
AIR NEW SOURCE		PERMIT	48895
AIR NEW SOURCE		ACCOUNT NUMBER	BL0038U
AIR NEW SOURCE F		AFS NUM	4803900009
AIR NEW SOURCE F	PERMITS	EPA ID	PSDTXP910
AIR NEW SOURCE F	PERMITS	REGISTRATION	75639
AIR NEW SOURCE F	PERMITS	REGISTRATION	76211
AIR NEW SOURCE F	PERMITS	REGISTRATION	71232
AIR NEW SOURCE F	PERMITS	EPA ID	PSDTX307A
AIR NEW SOURCE F		REGISTRATION	71063
AIR NEW SOURCE F		REGISTRATION	
AIR NEW SOURCE F			72689
		REGISTRATION	72545
AIR NEW SOURCE F		REGISTRATION	74040
AIR NEW SOURCE F		REGISTRATION	73707
AIR NEW SOURCE F		REGISTRATION	74788
AIR NEW SOURCE F		REGISTRATION	75318
AIR NEW SOURCE F		REGISTRATION	77064
AIR NEW SOURCE F	PERMITS	REGISTRATION	77079
AIR NEW SOURCE F	PERMITS	REGISTRATION	78148
AIR NEW SOURCE F		REGISTRATION	78728
IR NEW SOURCE F		REGISTRATION	79253
IR NEW SOURCE F	:::::::::::::::::::::::::::::::::::::	REGISTRATION	
IR NEW SOURCE P		REGISTRATION	80379
IR NEW SOURCE P			80616
		REGISTRATION	83109
RADIOACTIVE WAS		LICENSE	RW0219
		PERMIT ·	WDW013
		PERMIT	WDW224
INDERGROUND INJ	IECTION CONTROL	PERMIT	WDW318
INDERGROUND IN.	IECTION CONTROL	PERMIT	WDW326
	ECTION CONTROL	PERMIT	WDW359



WDW001 UNDERGROUND INJECTION CONTROL PERMIT INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD001700806 **PROCESSING** INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # 30138 (SWR) GENERATION TXD001700806 INDUSTRIAL AND HAZARDOUS WASTE **EPA ID** GENERATION TXR05O891 PERMIT STORMWATER LICENSE 0200049 WATER LICENSING 50189 INDUSTRIAL AND HAZARDOUS WASTE PERMIT COMPLIANCE PLANS SOLID WASTE REGISTRATION # 30138 IHW CORRECTIVE ACTION (SWR) 50189 INDUSTRIAL AND HAZARDOUS WASTE PERMIT POST CLOSURE PERMIT 50189 INDUSTRIAL AND HAZARDOUS WASTE STORAGE 50189 INDUSTRIAL AND HAZARDOUS WASTE PERMIT STORAGE

Location:

FM 2917, ALVIN, TX, 77512

Rating Date: 9/1/2007 Repeat Violator: NO

TCEQ Region:

REGION 12 - HOUSTON

Date Compliance History Prepared:

October 26, 2007

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

October 23, 2002 to October 23, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Phone:

713-767-3629

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

Yes

2. Has there been a (known) change in ownership of the site during the compliance period?

No

3. If Yes, who is the current owner?

N/A

4. if Yes, who was/were the prior owner(s)?

NHameed

N/A

5. When did the change(s) in ownership occur?

N/A

Components (Multimedia) for the Site:

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 10/10/2003

ADMINORDER 2002-0174-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak from the heat exchangers into the water of cooling towers E379CT3, E379CT4, and

70382EG.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.120(b)(9)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

SC 2 PERMIT

Description: Failure to notify the TCEQ in writing 30 days in advance of seal gap measurements taken in affiliation with the 1999, 2000, and 2001 annual external floating roof tank inspection of tanks 332T1-1 and

332T1-2.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.133(d)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

SC 2 PERMIT

Description: Failure to adequately conduct the 2001 seal gap measurements and generate raw data and calculations relating to external floating roof tank 332T1-1.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

SC5C PERMIT

Description: Failure to conduct stack testing of incinerator 55H2 within 60 days of start-up of the facilities.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120 40 CFR Part 63, Subpart G 63.152(c)(2) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete periodic report. Specifically, the periodic report submitted on April 25, 2000 for the October 1999 to March 2000 reporting period did not reference or include data

pertaining to incinerator EPN 55H2.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.118(f)(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit complete periodic reports.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)(1)

40 CFR Part 63, Subpart G 63.120(d)(2)(i) 40 CFR Part 63, Subpart G 63.122(b)

Ramt Prov. SC2 PERMIT

Description: Failure to have an adequate monitoring plan for absorbers 320S322-1 and 320S322-2, that

ensures the absorbers are being properly operated and maintained.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116,115(b)(2)(C)[G]

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: Not specified PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rates Table (MAERT) contained in TCEQ Air Permit No. 38336 for waste heat boiler EPN 70Z401 by emitting VOCs at 9.52 pounds per hour

(lbs./hr) when the permitted limit is 8.89 lbs./hr.

Effective Date: 02/20/2006

ADMINORDER 2005-0555-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit #39171, SC#4 PA

Description: Equistar failed to close the automatic inlet valve to the incinerator.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1 11/19/2002 (13812) 2 11/22/2002 (157067)

3 12/03/2002 (9849)

4 12/10/2002 (16608)

5 12/11/2002 (15178) 6 12/27/2002 (157071)

7 01/23/2003 (157075)

/ 01/23/2003 (15/0/5

8 01/31/2003 (22887) 9 02/07/2003 (9887)

9 02/07/2003 (9887) 10 02/12/2003 (24271)

10 02/12/2003 (242/1)

11 02/18/2003 (24434) 12 02/21/2003 (157034)

13 02/26/2003 (26108)

14 02/26/2003 (25864)

14 02/20/2003 (25804

15 02/26/2003 (26050)

16 02/26/2003 (25856)

17 02/26/2003 (26041)

18 02/26/2003 (25983)

19 02/26/2003 (25859)

20	02/26/2003	(26112)
21	02/26/2003	(25851)
22	02/26/2003	(25988)
23	02/26/2003	(25854)
24	02/26/2003	(26078)
25	02/27/2003	(24374)
26	03/04/2003	(23648)
27	03/12/2003	(27234)
28	03/21/2003	(157037)
29	03/28/2003	(28455)
30	04/21/2003	(157042)
31	05/20/2003	(37989)
32	05/21/2003	(157046)
33	06/20/2003	(157050)
34	07/01/2003	(36597)
35	07/22/2003	(157054)
36	08/14/2003	(148336)
37	08/14/2003	(148343)
38	08/19/2003	(149876)
39	08/21/2003	(151361)
40	08/21/2003	(151374)
41	08/25/2003	(150697)
42	08/25/2003	(294923)
43	09/11/2003	(248057)
44	09/11/2003	(248048)
45	09/23/2003	(294925)
46	10/21/2003	(294927)
47	10/27/2003	(281097)
48	10/29/2003	(253450)
49	10/29/2003	(253464)
50	11/12/2003	(253266)
51	11/12/2003	(252275)
52	11/21/2003	(294928)
53	11/25/2003	
		(255837)
54	11/25/2003	(255830)
55	11/25/2003	(250820)
56	11/25/2003	(255834)
57	11/25/2003	(255835)
58	12/02/2003	(255621)
59	12/18/2003	(257385)
60	12/18/2003	(257514)
61	12/23/2003	(294929)
62	01/12/2004	(258960)
63	01/12/2004	(258944)
64	01/16/2004	(255951)
65	01/23/2004	(294931)
66	02/23/2004	(294912)
67	02/26/2004	(255896)
68	02/27/2004	(262913)
69	02/27/2004	(262943)
70	02/27/2004	(263910)
71	02/27/2004	(262933)
72	02/27/2004	(262947)
73	02/27/2004	(262922)
74	03/22/2004	(294915)
75	03/29/2004	(267307)
76	03/30/2004	(332762)
77	04/12/2004	(253529)
78	04/13/2004	(265167)
79	04/16/2004	(267638)
80	04/20/2004	(294916)
81	05/25/2004	(294918)
82	06/17/2004	(273007)
83	06/21/2004	(294920)
84	07/23/2004	(351912)
85	07/30/2004	(284372)
86	08/03/2004	(283906)
87	08/19/2004	(351913)
٠,	.55. 70/2007	(301810)

	00/04/0004	(074005)
88	08/31/2004	(271365)
89	09/01/2004	(271988)
90	09/01/2004	(270694)
91	09/01/2004	(272089)
92	09/01/2004	(289574)
93	09/20/2004	(351914)
93		
94	09/23/2004	(334052)
95	09/23/2004	(334055)
96	10/13/2004	(337045)
97	10/13/2004	(337038)
98	10/22/2004	(351915)
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99	10/22/2004	(351918)
100	11/03/2004	(333514)
101	11/03/2004	(333511)
102	11/04/2004	(351917)
103	11/05/2004	(338995)
104	11/05/2004	(337520)
105	11/16/2004	(334879)
106	11/16/2004	(340676)
107	11/16/2004	(340661)
108	11/16/2004	(339730)
109	11/16/2004	(340570)
110	11/17/2004	(340850)
111	11/22/2004	(340787)
112	11/23/2004	(341009)
113	12/09/2004	(343333)
114	12/09/2004	(343311)
115	12/10/2004	(263071)
116	12/10/2004	(260541)
117	12/10/2004	(263070)
118	12/13/2004	(262649)
119	12/14/2004	(343317)
120	12/14/2004	(343284)
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121	12/15/2004	(351916)
122	12/16/2004	(336194)
123	12/17/2004	(344033)
124	12/20/2004	(338296)
125	12/20/2004	(335252)
126	12/20/2004	
		(338265)
127	12/22/2004	(381756)
128	12/23/2004	(336768)
129	12/28/2004	(344974)
130	12/30/2004	(343622)
131	12/30/2004	(345394)
		, ,
132	01/03/2005	(343620)
133	01/03/2005	(343624)
134	01/14/2005	(345345)
135	02/14/2005	(349294)
136	02/14/2005	(348976)
		. ,
137	02/21/2005	(349363)
138	02/22/2005	(381755)
139	02/24/2005	(349397)
140	02/28/2005	(347701)
141	03/24/2005	(419586)
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142	04/04/2005	(349690)
143	04/06/2005	(376386)
144	04/06/2005	(376392)
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145	04/06/2005	(376398)
146	04/06/2005	(376425)
147	04/06/2005	
		(376432)
148	04/06/2005	(376403)
149	04/08/2005	(376952)
150	04/18/2005	(419587)
151	04/19/2005	(376908)
152	04/25/2005	(377968)
153	05/11/2005	(348724)
154	05/16/2005	(380841)
155	05/23/2005	(419588)
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156	05/31/2005	(379386)
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157	05/31/2005	(374702)
158	05/31/2005	(379380)
159	06/08/2005	(348652)
		• •
160	06/13/2005	(345346)
161	06/23/2005	(419589)
162	06/29/2005	(394959)
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163	07/19/2005	(440731)
164	07/21/2005	(398102)
165	08/16/2005	(440732)
166	08/19/2005	(404318)
167	08/24/2005	(377022)
168	08/24/2005	(405509)
169	08/24/2005	(349399)
170	08/24/2005	(405513)
171	08/25/2005	(401920)
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172	08/29/2005	(401919)
173	08/30/2005	(401906)
174	09/01/2005	(401916)
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175	09/19/2005	(440733)
176	10/04/2005	(379884)
177	10/11/2005	(399217)
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178	10/21/2005	(433182)
179	10/21/2005	(433183)
180	10/24/2005	(468248)
181	11/28/2005	(468249)
182	12/20/2005	(435369)
183	12/20/2005	(439435)
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184	12/20/2005	(468250)
185	12/30/2005	(434386)
186	01/09/2006	· (439878)
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187	01/23/2006	(468251)
188	01/24/2006	(440227)
189	01/24/2006	(440219)
190	01/30/2006	(438969)
191	02/14/2006	(453399)
192	02/14/2006	(453392)
193	02/16/2006	(405519)
194	02/21/2006	(438633)
195	03/03/2006	(457603)
196	03/20/2006	(498075)
197	04/17/2006	(460779)
198	04/19/2006	(451614)
199	04/24/2006	(498076)
200	04/30/2006	(468247)
201	05/12/2006	(464820)
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202	05/12/2006	(464822)
203	05/12/2006	(464824)
204	05/12/2006	(464828)
		(464827)
205	05/12/2006	,
206	05/16/2006	(457449)
207	05/17/2006	(458668)
		, ,
208	05/18/2006	(451024)
209	05/18/2006	(449724)
210	05/22/2006	(498077)
211	05/31/2006	(466924)
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212	05/31/2006	(466929)
213	05/31/2006	(466931)
214	05/31/2006	(466932)
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215	06/05/2006	(463415)
216	06/21/2006	(467669)
217	06/21/2006	(480974)
218	06/23/2006	(498078)
219	06/29/2006	(482600)
220	06/29/2006	(482575)
221	06/29/2006	(466692)
222	07/10/2006	(464446)
223	07/20/2006	(467521)
		· · · · · · /

224	07/25/2006	(485504)
225	07/26/2006	(520095)
226	08/17/2006	(497124)
227	08/21/2006	(520096)
228	08/23/2006	(486778)
229	08/31/2006	(480128)
230	09/15/2006	(511153)
231	09/21/2006	(520097)
232	10/23/2006	(544349)
233	10/27/2006	(516020)
234	10/27/2006	(516053)
235	11/08/2006	(518116)
236	11/29/2006	(531921)
237	11/29/2006	(532004)
238	11/29/2006	(544350)
239	12/07/2006	(532264)
240	12/08/2006	(531936)
241	12/11/2006	(518239)
242	12/11/2006	(518235)
243	12/27/2006	(544351)
244	01/11/2007	(532283)
245	01/18/2007	(535916)
246	01/18/2007	(536107)
247	01/22/2007	(544352)
248	01/23/2007	(536763)
249	01/30/2007	(536987)
250	01/30/2007	(536993)
251	02/16/2007	(539392)
252	02/16/2007	(539392)
252	02/16/2007	(512464)
253	02/10/2007	(512404)
255	02/20/2007	(539360)
		(539395)
256	02/22/2007	
257	02/22/2007	(575043)
258	02/23/2007	(539396)
259	03/12/2007	(539403)
260	03/12/2007	(539397)
261	03/12/2007	(539398)
262	03/26/2007	(575044)
263	04/12/2007	(543396)
264	04/12/2007	(543389)
265	04/12/2007	(543359)
266	04/12/2007	(543411)
267	04/12/2007	(543393)
268	04/19/2007	(575045)
269	05/23/2007	(575046)
270	06/08/2007	(543508)
271	06/13/2007	(563309)
272	06/25/2007	(575047)
273	06/26/2007	(558363)
274	07/05/2007	(565543)
275	07/05/2007	(564044)
276	07/06/2007	(560348)
277	07/23/2007	(575048)
278	08/17/2007	(571117)
279	08/17/2007	(571120)
280	08/17/2007	(571122)
281	08/17/2007	(571113)
282	08/17/2007	(571116)
283	08/22/2007	(573057)
284	08/28/2007	(566965)
285	08/28/2007	(566968)
286	08/29/2007	(572199)
287	08/30/2007	(571497)
288	09/27/2007	(594475)
289	09/27/2007	(593895)
290	09/28/2007	(565072)
291	10/04/2007	(565781)

(594030)292 10/16/2007

Written notices of violations (NOV). (CCEDS Inv. Track. No.) Ε

Date: 12/03/2002

(9849)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation: Description:

failed to conduct audio, olfactory, and visual checks for Hydrogen Fluoride (HF)

leaks within the operating area for both the shifts (day and night) on September 29, 2002 and the day shift on July 22, 2002 as required by their TCEQ Air Permit

No. 6534, Special Condition (SC) 13 A.

Self Report?

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Minor

Classification:

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Description:

failed to record pH values of caustic scrubber liquor effluent on 8/28/00, 9/4/00,

10/31/00, 11/11/00, 11/13/00, 11/14/00, 12/28/00, 2/20/01, 3/6/01,

4/18/01,6/17/01, 6/18/01, 7/27/01, 7/28/01, 8/01/01, and 10/4/01 as required by

their TCEQ Air Permit No. 6534, Special Condition (SC) 4.

Date: 12/27/2002

(142104)

Self Report?

30 TAC Chapter 113, SubChapter C 113.120

Citation: Description:

SOCMI-VNTS. VESSL., WW

Date: 01/31/2003

(157034)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Description:

Citation:

Failure to meet the limit for one or more permit parameter

Date: 07/31/2003

(294923)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Citation:

Citation:

Failure to meet the limit for one or more permit parameter

Description: Date: 10/31/2003

(294928)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Description:

Failure to meet the limit for one or more permit parameter

Date: 03/30/2004 Self Report?

(332762)

(294920)

30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(17)

Citation:

Citation:

NON-RPT VIOS FOR MONIT PER OR PIPE

Description: Date: 05/31/2004

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 11/16/2004 (339730)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

Citation:

PERMIT 18251 and N-011, S.C No. 4 Failure to operate the flare within MAERT limits

Description: Date: 11/17/2004

(340850)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT 18251, S.C No.4

Description:

Failure to prevent the leaks from the valves 30HIC4-A/B and caused the release of

air contaminants from the emission point which is not listed in the MAERT. (341009)

Date: 11/18/2004

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PERMIT 18251, S.C. No.4

Description:

Failure to prevent tripping of the boiler (30H5) and relit the burners in a timely

manner and caused the release of air pollutants from the emission point that was

not listed in the MAERT.

Date: 11/22/2004

(340787)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)[G]

Description:

Failure to to submit the initial notification of the emissions event within 24 hours

after the start of incident.

Self Report? Citation:

NO

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT 32151, S.C. No.1

Description:

Failure to limit the emissions from the scrubber within the MAERT limits.

Date: 12/13/2004 (262649)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: Description: PA TCEQ Air Permit No. 18251, SC #4

Date: 12/20/2004

Solutia failed to prevent moisture from entering the igniter unit on the flare.

Self Report?

(335252)

Classification: Moderate

Classification:

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PA TCEQ Air Permit #18251, SC #1

Description:

Sterling Chemicals failed to prevent external corrosion on a pipeline.

Date: 12/31/2004

Citation:

(351918)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Description:

Failure to meet the limit for one or more permit parameter

Date: 01/03/2005

(343620)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Citation: Rqmt Prov:

PA TCEQ Air Permit No. 38336, SC #4

Description:

Solutia inadvertently sent steam through the drain line to the process sewer

increasing the pressure in the process sewer tank.

Self Report?

Classification:

Classification:

Classification:

Classification:

Classification:

Minor

Moderate

Moderate

Moderate

Minor

Moderate

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

Description:

Failure to report an emissions event (Incident #45511) that occurred at the AN7

Unit in a timely manner.

Date: 02/14/2005

(348976)

(349690)

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Solutia failed to prevent a fire suppression discharge which resulted in a release of

145 pounds (lbs) of Halon 1301 (bromotrifluoromethane).

Date: 04/04/2005

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

The regulated entity failed to prevent a shutdown of the AN2 waste heat boiler due

to the malfunction of the valve positioner.

Self Report?

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101,201(b)(8)

Description:

Solutia, Inc., - Chocolate Bayou Plant failed to identify on the emissions event

report the permit number authorization.

Date: 07/21/2005

Citation:

(398102)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT TCEQ Permit #18251, SC #4

Description:

Solutia failed to include the facility's authorization limit and number on the final

report.

Self Report?

Classification:

NO

Citation: Description: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Solutia failed to include the facility's authorization limit and number on the final

Date: 08/24/2005

report.

Self Report?

(377022)

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Rgmt Prov:

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

PERMIT 18251 SC 4

Solutia failed to properly tighten a valve.

Date: 08/24/2005

(349399)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

PA TCEQ Air Permit No. 38998, SC#4 Rgmt Prov:

Description: The regulated entity failed to prevent a leak in a propylene pump.

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.201(b)(8) Citation:

failed to identify the permit number representing the propylene pump in the Description:

emissions event report. Date: 09/30/2005

(468248) Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description: Date: 10/31/2005 (468249)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

Classification:

Classification:

Moderate

Moderate

Moderate

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

(405519) Date: 02/16/2006

Classification: Self Report?

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

Failure to record quarterly opacity observation on Unit ID: 350H1-1 Description:

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.142(1)(E)

Description: Solutia, Inc., failed to equipt Unit IDs:P-10 and P-13, with a Close-Vent system.

Date: 02/17/2006 (405519)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)

Ramt Prov: **PERMIT O-02325**

Failure to comply with the requirements of 30 TEX. ADMIN. CODE Chapter Description: 106.472(9).

Date: 03/02/2006 (457603)

Self Report? Classification: Moderate

30 TAC Chapter 113, SubChapter C 113.120 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b) Rqmt Prov: PERMIT SC 2

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels

that constitute a leak from the heat exchangers into the water of cooling towers

E379CT3, E379CT4, and 70382EG.

Classification: Self Report? Major

Citation: 2A TWC Chapter 7, SubChapter A 7.101

Ramt Prov: ORDER Ordering Provision 3.a. Failure to comply with ordering provisions of the Commission Order Docket No. Description:

2002-0174-AIR-E.

Date: 07/25/2006 (485504)

Classification: Self Report? Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PERMIT No. 18251, Special Condition 4

Description: Failure to prevent unauthorized emissions.

Self Report? Classification: Moderate

30 TAC Chapter 101, SubChapter F 101.221(a) Citation:

Failure to maintain the AN2 Flare in good working order during facility operations. Description:

Date: 07/31/2006

Self Report? Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter Date: 08/31/2006 (520097)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter Date: 08/31/2006 (480128)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b) Description: Failure to maintain the tank throughputs for the acetic tank and water circulating tank as represented in the permit application dated February 29, 2000 for the TCEQ Permit no. 38336. Classification: Minor NO Self Report? 30 TAC Chapter 115, SubChapter D 115.352(4) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: PERMIT 38336, Special Condition 23.E OP O-02324, Special Condition 18 OP O-02324, Special Condition 1A Failure to install caps/plugs/flanges on eight open-ended lines in unit 70ANFUG. Description: Classification: NO Self Report? Citation: 30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(2) 5C THC Chapter 382, SubChapter D 382.085(b) OP O-02324, Special Condition 1A Ramt Prov: Description: Failure to conduct a first attempt at repair on 1 valve within five calendar days after a leak was detected in the AN 7 Unit. Self Report? NO Classification: Minor Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov: PERMIT 38336, Special Condition 12B OP O-02324, Special Condition 18 Description: Failure to maintain three pilots on the flare 70Z522. Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) PERMIT 38336, Special Condition 4 Ramt Prov: PERMIT 38336, Special Condition 8A OP O-02324, Special Condition 18 Failure to maintain the NOx emissions from the boiler 70Z401 within the permit Description: limit in the AN7 Unit. Date: 11/29/2006 (532004)Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT No. 38998, Special Condition 4 Ramt Prov: Failure to prevent unauthorized emissions. Description: Date: 12/31/2006 (544352)Classification: Moderate Self Report? YES Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description: Date: 02/16/2007 (512464)Classification: Minor Self Report? 30 TAC Chapter 115, SubChapter D 115.352(4) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) OP FOP O-02321, SC 12 Rqmt Prov: OP FOP O-02321, SC 1A PA NSR 18251 SC 14E

PA NSR 18251, SC 12E

Description:

Failure to cap 10 open-ended lines in HRVOC and HAP service.

Classification:

Moderate

Minor

Date: 02/21/2007 (539360)

Self Report?

Citation:

30 TAC Chapter 331, SubChapter D 331.63(e)

Ramt Prov: PERMIT PROVISION VII.D.

Description: Violation of maximum injection flow rate.

(594475)

Date: 09/27/2007

Self Report? Classification:

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

OP FOP No. 2324, Spec. Cond 18

OP FOP No. 2324, Spec. Cond. 1A

PERMIT NSR Permit No. 38336, Spec. Cond. 20E

Description:

Failure to seal four (4) open ended lines in VOC service during the compliance

period

F. Environmental audits.

Notice of Intent Date: 09/23/2004

(347742)

No DOV Associated

Notice of Intent Date: 01/03/2006

(453378)

No DOV Associated

Notice of Intent Date: 04/07/2006

(462917)

No DOV Associated

Notice of Intent Date:

05/25/2006 (481532)

Disclosure Date:

11/14/2006

Viol. Classification: Minor

. .,

Rqmt Prov:

PERMIT 32151, SC 8A

04/23/2007

Description: F

Failure to notify the regional office 45 days prior to schedule stack sampling for scrubber 83S14 and 83S6.

Notice of Intent Date:

(559025)

No DOV Associated

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

1. Participation in a voluntary pollution reduction program.

N/A

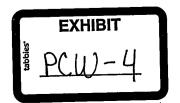
J. Early compliance.

N/A

Sites Outside of Texas

N/A

Policy Revision 2 (Sept		alty	Calculation	on Works	sheet (P	•	/ Revision January 29, 20	008
TCEQ								,
DATES Assigned PCW	4-Feb-2008 27-Mar-2009	Screenir	ng 3-Mar-2008	EPA Due	9-Dec-2008	Í	- Pan akidene adami.	
RESPONDENT/FACILITY	INFORMATION		31 111		10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
Respondent	Solutia Inc.							
Reg. Ent. Ref. No. Facility/Site Region				Major/	Minor Source	Major		
CASE INFORMATION Enf./Case ID No.	25400				of Violations	[2		
	2008-0062-AIR-E			- No.	Order Type			
Media Program(s)				Enf		Kimberly Mora	ales	
Multi-Media		40	Tau -	040.000	EC's Team	Enforcement :	ream 5	
Admin. Penalty \$ L	imit Minimum	\$0	Maximum	\$10,000	······································			
		Pen	alty Calcul	ation Sec	tion			
TOTAL DACE DENAL	TV /C of						¢= 0	00
TOTAL BASE PENAL	. I Y (Sum of VI	olation	i base penait	ies) — — —	1. Alberta elaba	Subtotal 1	\$5,00	00
ADJUSTMENTS (+/-)								
Subtotals 2-7 are obtain	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Total Base	and a comment of the company of the figure	The same of the same of the same of		242100000	<u>+0.2</u>	00
Compliance Histo				6 Enhancement		otals 2, 3, & 7	\$9,30	00
Notes			received 15 NO' non-similar viola					
Notes			IOIs and one DC					
		roughter was in Leading	eran elemente element		enis ceres aparenes v. p.			
Culpability	No		4-31 (0)	6 Enhancement		Subtotal 4		\$0
Notes	The Res	pondent	does not meet t	ne culpability cr	iteria.			
Good Faith Effort	the second secon	IOV to EDI	0% PRP/Settlement Offe	And the self factor and the factor		Subtotal 5		\$0
Ordinary								
N/A	X (n	ark with x)				Ī		
Notes	The Res	pondent	does not meet t	ne good faith cr	iteria.			
Approx. (Total EB Amounts Cost of Compliance	\$158 \$3,000		6 Enhancement* ed at the Total EB \$	i Amount	Subtotal 6		\$0
SUM OF SUBTOTALS	S 1-7					inal Subtotal	\$14,30	00
OTHER FACTORS AS Reduces or enhances the Final Si				0%		Adjustment	· ·	\$0
		, ,						
Notes								
ļ		•			Fig. I De		<u> </u>	
	•				rinai Per	nalty Amount	\$14,30	טט
STATUTORY LIMIT A	DJUSTMENT			Annual Control of the	Final Asse	ssed Penalty	\$14,30	00
DEFERRAL					Reduction	Adjustment	4	\$0
Reduces the Final Assessed Pena	alty by the indicted per	centage. (I	Enter number only; e	.g. 20 for 20% redu	ction.)			ᅱ
Notes	Deferr	al not off	ered for non-exp	edited settleme	ent.			
PAYABLE PENALTY							\$14,30	00
			and the second s	and the second s	Annual Control of Control of		,	



Docket No. 2008-0062-AIR-E

PCW

Policy Revision 2 (September 2002)
PCW Revision January 29, 2008

Respondent Solutia Inc. Case ID No. 35488

Reg. Ent. Reference No. RN100238682

Media [Statute] Air

Enf. Coordinator Kimberly Morales

Compliance History Worksheet

	Component	V Site Enhancement (Subtotal 2) Number of	Inter Number Here	Adjust.
	NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	15	75%
		Other written NOVs	19	38%
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	4	80%
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
	Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
	Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
	Emissions	Chronic excessive emissions events (number of events)	0.	0%
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	5	-5%
	, todico	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	1	-2%
		Pleas	se Enter Yes or No	
	Other	Environmental management systems in place for one year or more	No	0%
		Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No ·	0%
		Participation in a voluntary pollution reduction program	No	0%
		Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	** 51.411.	Adjustment Po	ercentage (Su	btotal 2) 18
Repea	at Violator (Su	ototal 3)		
	No	Adjustment Po	ercentage (Su	btotal 3) 0
Comp	liance History	Person Classification (Subtotal 7)		
	Average Pe	erformer Adjustment Po	ercentage (Su	btotal 7) 0
Comp	liance History	Summary	al al Testi	
	Compliance History Notes	The Respondent has received 15 NOVs for the same or similar violations, 19 NOVs for r violations, four 1660 Orders, and has submitted five NOIs and one DOV in the past five	on-similar e years.	
	•			

Scr	eening Date	3-Mar-2008		Dock	et No. 2008-006	2-AIR-E		PCW
	Respondent	Solutia Inc.					Policy R	evision 2 (September 2002)
	Case ID No.	35488					PCW	/ Revision January 29, 2008
1 · · ·	eference No.		32					
I' .	dia [Statute]							
1	Coordinator		rales					
Vio	lation Number	1			met			1
	Rule Cite(s)	30 Tex. Adı			alth & Safety Code pecial Condition 4	§ 382.085(b)	; and Air	
Violatio	on Description	2007, as Specification hydrogen cy released from emission respect	documented durin ally, approximately vanide ("HCN"), an em emission point r n limits for AN, HC ively. Since the er	g an investiga 189 pounds (" d 258 lbs of vo number ("EPN' N and VOCs a nissions event	event which occur tion conducted on 'lbs") of acrylonitrik platile organic com ') 30H5 during the re 2.09, 1.26 and was avoidable, it 30 Tex. Admin. Co	December 4, e ("AN"), 308 pounds ("VOO 36 minute eve 12.04 lbs per l does not mee	2007. lbs of cs") were ent. The nour, t the	
						Base	e Penalty	\$10,000
>> Environmenta	ACCENTER SECURITION OF THE SEC	N. A. Salar (S. P. St. et al.) An Albanica (Marie Marie Mari	Harm					
OR	Release Actual	Major	Moderate	Minor	•			
	Potential				Percent	25%		
	· Otornan		<u> </u>		reicent	2076		
>>Programmatic	Matrix				1000			
	Falsification	Major	Moderate	Minor	80000 BERGEVIUS			
					Percent	0%		
Matrix Notes	The emission	ns event resu		of an insignific protective leve	ant amount of policels.	utants which o	loes not	·
	L							
		eta			Adjustment		\$7,500	
							F	
						•	L	\$2,500
Violation Events				7000 - 721 m - 721 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		Market 1		
	Number of Viol	lation Events	1		1 Number of	f violation day	s	
	. [daily						
		monthly						
	mark only one with an x	quarterly semiannual	X		. V	iolation Base	Penalty	\$2,500
		annual						
		single event						
		den av 1855 den greenskelin [1	Line - in the second					
			One quarterly	event is recom	mended.			
Economic Benefi	t (EB) for this	s violation			Statutor	y Limit Tes		
	Estimated	EB Amount	and the second second of the second s	\$83]		· commenceror control		e are en la la la marie de la company
	Lounatou	Amount		Ψυσ	violatio	n Final Pena	ıτy ιotal∐	\$7,150
			This vi	iolation Final	Assessed Penalty	/ (adjusted fo	r limits)	\$7,150
			Signed Control	三、海道市1000	APPROPRIATE TO THE RELIEF			

	E	conomic	Benefit W	orks	heet		
Respondent	Solutia Inc.	aray aya ast see af a m		* *	w ve	the section of the se	
Case ID No	35488						
Reg. Ent. Reference No.	RN100238682						
Media							Years of
Violation No.	• • • • • • • • • • • • • • • • • • • •					Percent Interest	Depreciation
Violation No	1 2 5 5 5			ari Myra		5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
		Date Required	rillai Dale	113	iliterest Javeu	Offetime Costs	LD Alliount
Item Description	No commas or \$						Marketini na
Delayed Costs	,			**********			y carago
Equipment		1		0.0	\$0	\$0 I	\$0
Buildings		 		0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0,0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a.	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$1,500	26-Sep-2007	1-Nov-2008	1.1	\$83	n/a	\$83
Notes for DELAYED costs			when compliance	is expec	ted to be achieve		
Avoided Costs	ANN	NUALIZE [1] avoid	ed costs before e	ntering i	tem (except for \$0	one-time avoided c	osts) \$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
						,	
Notes for AVOIDED costs							
Notes for AVOIDED costs		•					
Approx. Cost of Compliance		\$1,500			TOTAL		\$83

Screening Date	3-Mar-2008	Docket No. 2008-0062-	AIR-E PCW
Respondent	Solutia Inc.		Policy Revision 2 (September 2002)
Case ID No.			PCW Revision January 29, 2008
Reg. Ent. Reference No.			
Media [Statute]			
Enf. Coordinator		es	
Violation Number		in Onde Cate Cate Cate Cate Cate Cate Cate Cat	202 005/h), and Air
Rule Cite(s)	30 Tex. Adm	in. Code § 116.115(c); Tex. Health & Safety Code § Permit No. 18251, Special Condition 4	382.085(b); and Air
Violation Description	as documen approximatel EPN 30H5 dui and VOCs a	ent an unauthorized emissions event which occurred ed during an investigation conducted on January 31, y 99 lbs of AN, 210 lbs of HCN, and 535 lbs of VOCs ing the one hour and nine minute event. The emission re 2.09, 1.26 and 12.04 lbs per hour, respectively. Spidable, it does not meet the demonstrations for an a 30 Tex. Admin. Code § 101.222(b)(1-11).	, 2008. Specifically, were released from on limits for AN, HCN Since the emissions
			Base Penalty \$10,000
>> Environmental, Property	and Human I		
Release	Maian	Harm Madagata Miner	
OR Actua		Moderate Minor x	
Potentia		Percent	25%
		<u>-</u>	
>>Programmatic Matrix	Liverbook 1915		
Falsification	Major	Moderate Minor	
		Percent	0%
Matrix Notes The emiss	ions event resul	ed in the release of an insignificant amount of polluta exceed protective levels.	ants which does not
		Adjustment	\$7,500
		Control of the second of the s	Ψ1,000
			\$2,500
Violation Events			
Number of Vi	olation Events	1 Number of v	violation days
14dinbel Of VI	CIGGOTI EVELICA		Totalon days
mark only one with an x	daily monthly quarterly semiannual annual single event	X Vic	plation Base Penalty \$2,500
			·
		One quarterly event is recommended.	
Economic Benefit (EB) for th	is violation	Statutory	Limit Test
Estimate	d EB Amount	\$76 Violation	n Final Penalty Total \$7,150
	_		
		This violation Final Assessed Penalty	(adjusted for limits) \$7,150

		conomic	Benefit W	orks	neet		
Respondent	Solutia Inc.		w w				
Case ID No	. 35488						
Reg. Ent. Reference No							
Media							Years of
		•				Percent Interest	Depreciation
Violation No	.: 2	and the second of the second	with a property of	or in the species	ag ary to pro mo tive	· · · · ·	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	n No commas or \$			na. Santan			
And the second s		e gant and a gant and a second	enn e vinningtij.		eng en egener	en e	1,777,771
Delayed Costs	;	,	1	7 ~ ~ 1		I 60 I	<u> </u>
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0 \$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal			ļ	0.0	\$0	###1#n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$1,500	30-Oct-2007	1-Nov-2008	1.0	\$76	n/a	\$76
	Estimated cost	to provide training	a to prevent reoccu	irrence. [Date required is the	ne date of the event	and final date is
Notes for DELAYED costs			when compliance	is expec	ted to be achieve		
Avoided Costs			when compliance	is expec	ted to be achieve	d. one-time avoided c	osts)
Avoided Costs			when compliance	e is expec	ted to be achieve	d. one-time avoided c	osts) (
Avoided Costs Disposal Personnel			when compliance	entering 0.0	ted to be achieve tem (except for \$0 \$0	d. one-time avoided c \$0 \$0	osts)
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			when compliance	e is expec	ted to be achieve tem (except for \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0	so \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment			when compliance	0.0 0.0 0.0 0.0	ted to be achieve tem (except for \$0 \$0 \$0 \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			when compliance	entering i 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	ted to be achieve tem (except for \$0 \$0 \$0 \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	so so so so so
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			when compliance	entering I	ted to be achieve tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			when compliance	entering i 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	ted to be achieve tem (except for \$0 \$0 \$0 \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	so \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			when compliance	entering I	ted to be achieve tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)			when compliance	entering I	ted to be achieve tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

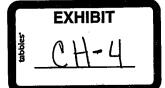
Compliance History

Customer/Respondent/Owner-Operator:

Regulated Entity:

ID Number(s):

Classification: AVERAGE Rating: 2.31 CN600132856 Solutia Inc. Site Rating: 1.61 Classification: AVERAGE CHOCOLATE BAYOU PLANT RN100238682 BL0038U ACCOUNT NUMBER AIR OPERATING PERMITS 1258 **PERMIT** AIR OPERATING PERMITS **PERMIT** 2317 AIR OPERATING PERMITS 2318 AIR OPERATING PERMITS **PERMIT** 2319 AIR OPERATING PERMITS PERMIT 2320 AIR OPERATING PERMITS **PERMIT** 2321 AIR OPERATING PERMITS PERMIT 2322 AIR OPERATING PERMITS PERMIT 2323 AIR OPERATING PERMITS **PERMIT** 2324 **PERMIT** AIR OPERATING PERMITS 2325 AIR OPERATING PERMITS PERMIT 0200049 PUBLIC WATER SYSTEM/SUPPLY REGISTRATION WQ000001000 PERMIT WASTEWATER TPDES0003875 PERMIT WASTEWATER TX0003875 PERMIT WASTEWATER REGISTRATION 83875 AIR NEW SOURCE PERMITS 2271 PERMIT AIR NEW SOURCE PERMITS 3046 PERMIT AIR NEW SOURCE PERMITS 5065 PERMIT AIR NEW SOURCE PERMITS 5084 PERMIT AIR NEW SOURCE PERMITS 5336 **PERMIT** AIR NEW SOURCE PERMITS 6534 **PERMIT** AIR NEW SOURCE PERMITS 8372 **PERMIT** AIR NEW SOURCE PERMITS 14488 **PERMIT** AIR NEW SOURCE PERMITS **PERMIT** 18130 AIR NEW SOURCE PERMITS PERMIT 18251 AIR NEW SOURCE PERMITS 28694 PERMIT AIR NEW SOURCE PERMITS 32151 **PERMIT** AIR NEW SOURCE PERMITS 34029 **PERMIT** AIR NEW SOURCE PERMITS 38336 PERMIT AIR NEW SOURCE PERMITS PERMIT 38998 AIR NEW SOURCE PERMITS 39171 PERMIT AIR NEW SOURCE PERMITS 39643 AIR NEW SOURCE PERMITS PERMIT 48895 PERMIT AIR NEW SOURCE PERMITS BL0038U ACCOUNT NUMBER AIR NEW SOURCE PERMITS REGISTRATION 75639 AIR NEW SOURCE PERMITS 76211 REGISTRATION AIR NEW SOURCE PERMITS 4803900009 AFS NUM AIR NEW SOURCE PERMITS 71232 REGISTRATION AIR NEW SOURCE PERMITS PSDTX307A FPA ID AIR NEW SOURCE PERMITS 71063 REGISTRATION AIR NEW SOURCE PERMITS PSDTXP910 FPA ID AIR NEW SOURCE PERMITS 72689 AIR NEW SOURCE PERMITS REGISTRATION 72545 REGISTRATION AIR NEW SOURCE PERMITS 74040 REGISTRATION AIR NEW SOURCE PERMITS 73707 REGISTRATION AIR NEW SOURCE PERMITS 74788 REGISTRATION AIR NEW SOURCE PERMITS REGISTRATION 75318 AIR NEW SOURCE PERMITS REGISTRATION 77064 AIR NEW SOURCE PERMITS 77079 REGISTRATION AIR NEW SOURCE PERMITS 78148 REGISTRATION AIR NEW SOURCE PERMITS 78728 REGISTRATION AIR NEW SOURCE PERMITS 79253 REGISTRATION AIR NEW SOURCE PERMITS 80379 REGISTRATION AIR NEW SOURCE PERMITS 80616 REGISTRATION AIR NEW SOURCE PERMITS 83109 REGISTRATION AIR NEW SOURCE PERMITS RW0219 RADIOACTIVE WASTE DISPOSAL LICENSE WDW013 UNDERGROUND INJECTION CONTROL PERMIT **WDW224** UNDERGROUND INJECTION CONTROL PERMIT **WDW318** UNDERGROUND INJECTION CONTROL **PERMIT WDW326** PERMIT UNDERGROUND INJECTION CONTROL



UNDERGROUND INJECTION CONTROL PERMIT WDW359 UNDERGROUND INJECTION CONTROL PERMIT WDW002 UNDERGROUND INJECTION CONTROL **PERMIT** WDW001 INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD001700806 **PROCESSING** SOLID WASTE REGISTRATION # 30138 INDUSTRIAL AND HAZARDOUS WASTE (SWR) GENERATION TXD001700806 INDUSTRIAL AND HAZARDOUS WASTE EPA ID **GENERATION** TXR05O891 STORMWATER PERMIT LICENSE 0200049 WATER LICENSING INDUSTRIAL AND HAZARDOUS WASTE **PERMIT** 50189 **COMPLIANCE PLANS** SOLID WASTE REGISTRATION # 30138 IHW CORRECTIVE ACTION (SWR) INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50189 POST CLOSURE **PERMIT** 50189 INDUSTRIAL AND HAZARDOUS WASTE STORAGE INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50189 STORAGE Rating Date: September 01 07 Repeat Violator: NO FM 2917, ALVIN, TX, 77512

Location:

TCEQ Region:

REGION 12 - HOUSTON

Date Compliance History Prepared:

March 03, 2008

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

March 03, 2003 to March 03, 2008

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Audra Ruble

Phone:

(361) 825-3126

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

Yes

2. Has there been a (known) change in ownership of the site during the compliance period?

No N/A

3. If Yes, who is the current owner?

N/A

4: if Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

Effective Date: 10/10/2003

ADMINORDER 2002-0174-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113,120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

SC 2 PERMIT Ramt Prov:

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak

from the heat exchangers into the water of cooling towers E379CT3, E379CT4, and 70382EG.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.120(b)(9)

5C THC Chapter 382, SubChapter A 382.085(b)

SC 2 PERMIT Ramt Prov:

Description: Failure to notify the TCEQ in writing 30 days in advance of seal gap measurements taken in affiliation

with the 1999, 2000, and 2001 annual external floating roof tank inspection of tanks 332T1-1 and 332T1-2.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.133(d)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to adequately conduct the 2001 seal gap measurements and generate raw data and

calculations relating to external floating roof tank 332T1-1.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC5C PERMIT

Description: Failure to conduct stack testing of incinerator 55H2 within 60 days of start-up of the facilities.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.152(c)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete periodic report. Specifically, the periodic report submitted on April 25,

2000 for the October 1999 to March 2000 reporting period did not reference or include data pertaining to

incinerator EPN 55H2.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.118(f)(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit complete periodic reports.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)(1)

40 CFR Part 63, Subpart G 63.120(d)(2)(i) 40 CFR Part 63, Subpart G 63.122(b)

Rqmt Prov: SC2 PERMIT

Description: Failure to have an adequate monitoring plan for absorbers 320S322-1 and 320S322-2, that ensures

the absorbers are being properly operated and maintained.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: Not specified PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rates Table (MAERT) contained in TCEQ Air Permit No. 38336 for waste heat boiler EPN 70Z401 by emitting VOCs at 9.52 pounds per hour (lbs./hr) when

the permitted limit is 8.89 lbs./hr.

Effective Date: 02/20/2006

ADMINORDER 2005-0555-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit #39171, SC#4 PA

Description: Equistar failed to close the automatic inlet valve to the incinerator.

Effective Date: 11/19/2007

ADMINORDER 2005-0166-AIR-E

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to report the November 17, 2004 emissions event within 24 hours after its discovery.

Specifically, the emissions event that was discovered on November 17, 2004 was not reported until December 22,

2004 as documented during an investigation conducted from April 22, 2005 to May 2, 2005.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit No. 18251, SC#4 PA

Description: Failure to comply with permitted emissions imitd during an emisisons event on November 17, 2004.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: O-02317, ST&C 3A(iii) OP

Description: Failure to maintain records documenting quarterly opacity observations of tank 55T12 and scrubber 55K1, as reported in a deviation report for the period of June 1, 2004 through NOvember 30, 2004 for the NTA

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.146(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to maintain records documenting the VOC concentration of the exhaust gas associted with 578T5 in order to demonstrate proper function of the carbon canister control equipment, as reported ina deviation report for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: NSR 2271, GC 8 PERMIT

Description: Failure to comply with the permitted short-term ammonia emissions limits for scrubber 55K1, as reported in deviation report for the period of December 1, 2004 thorugh May 31, 2005 for the NTA unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.116(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: NSR 2271, GC 1 PERMIT

Description: Failure to comply with the permit representations relating to annual HTMA production, annual ammonia usage, and annual ammonia production, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the NTA unit.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.132(e)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to include the following emission units in the Title V application: 55S101, 55S102, 55S103,

and 55S104.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to obtain authorization for the carbon absorption system on wastewater tank 57T5 prior to installation, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov: General Condition No. 1 OP

Description: Failure to operate residue strip tank 57T34 on June 12 and 28, 2004 and August 16, 2004 within temperature ranges specified in the permit application, as reported in a deviation report for the period of Une 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

General Condition No. 8 OP

Description: Failure to include all gas streams going to vent condenser 57E22 from exceeding rolling annual permitted emissions limits, as reported ina deviationreport for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 18251 and N-011, SC No. 4 PA

Description: Failure to prevent unauthroized emisisons during an October 9, 2005 emissions event.

Effective Date: 01/28/2008

ADMINORDER 2006-1599-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Pamt Prove T

TCEQ Air Permit #18251, SC #4 PA

Description: Failure to prevent unauthorized emissions during a January 11, 2004 emissions event.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report an emissions event within 24 hours after its discovery.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report an emissions event within 24 hours after its discovery.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No. 18251, SC No. 4 PERMIT

Description: Failure to prevent uanuthorized emissions during an emissions event that started on November 15,

2004.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit No. 18251 PA

Description: Failure to prevent unauthorized emissions during an emissions event that started on November 1,

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit No. 18251, SC #4 PA

Description: Failure to prevent unauthorized emissions during an emissions event that started on November 2,

2004.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Solutia failed to submit an emissions event report within 24 hours after discovery of the

event Incident No. 68042. Specifically, the emissions event was discovered on November 12, 2005 at 0944, but

was not reported until November 15, 2005 at 1441.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

No. 18251, Special Condition No. 4 PERMIT

Description: Solutia failed to prevent unauthorized emissions during an emissions event, Incident 68043, that

occurred on November 12, 2005 and lasted 1 hour and 25 minutes.

Any criminal convictions of the state of Texas and the federal government. В.

N/A

C. Chronic excessive emissions events.

N/A

The approval dates of investigations. (CCEDS Inv. Track. No.) D.

1 03/04/2003 (23648)2 03/12/2003 (27234)3 03/21/2003 (157037)4 03/28/2003 (28455)5 04/21/2003 (157042)6 05/20/2003 (37989)7 05/21/2003 (157046)8 06/20/2003 (157050)9 07/01/2003 (36597)(157054)10 07/22/2003 11 08/14/2003 (148336)12 08/14/2003 (148343)13 08/19/2003 (149876)

14 08/21/2003 (151361)

15 08/21/2003 (151374)

(150697)16 08/25/2003

17 08/25/2003 (294923)

(248057)18 09/11/2003

19 09/11/2003 (248048)

(294925)20 09/23/2003

21 10/21/2003 (294927)

22 10/27/2003 (281097)

23	10/29/2003	(253450)
24	10/29/2003	(253464)
25	11/12/2003	(253266)
26	11/12/2003	(252275)
27	11/21/2003	(294928)
28	11/25/2003	(255837)
29	11/25/2003	(255830)
30	11/25/2003	(250820)
31	11/25/2003	(255834)
32	11/25/2003	(255835)
33	12/02/2003	(255621)
34	12/18/2003	(257385)
	12/18/2003	(257514)
35		, ,
36	12/23/2003	(294929)
37	01/12/2004	(258960)
38	01/12/2004	(258944)
39	01/16/2004	(255951)
40	01/23/2004	(294931)
41	02/23/2004	(294912)
42	02/26/2004	(255896)
43	02/27/2004	(262913)
44	02/27/2004	(262943)
45	02/27/2004	(263910)
		(262933)
46	02/27/2004	
47	02/27/2004	(262947)
48	02/27/2004	(262922)
49	03/22/2004	(294915)
50	03/29/2004	(267307)
51	03/30/2004	(332762)
52	04/12/2004	(253529)
53	04/13/2004	(265167)
54	04/16/2004	(267638)
55	04/20/2004	(294916)
56	05/25/2004	(294918)
57	06/17/2004	(273007)
58	06/21/2004	(294920)
59	07/23/2004	(351912)
60	07/30/2004	(284372)
61	08/03/2004	(283906)
62	08/19/2004	(351913)
63	08/31/2004	(271365)
64	09/01/2004	(271988)
65	09/01/2004	(270694)
66	09/01/2004	(272089)
67	09/01/2004	(289574)
68	09/20/2004	(351914)
69	09/23/2004	(334052)
70	09/23/2004	(334055)
71	10/13/2004	(337045)
72	10/13/2004	(337038)
73	10/22/2004	(351915)
74	10/22/2004	(351918)
75	11/03/2004	(333514)
76	11/03/2004	(333511)
77	11/04/2004	(351917)
78	11/05/2004	(338995)
	11/05/2004	(337520)
79		•
80	11/16/2004	(334879)
81	11/16/2004	(340676)
82	11/16/2004	(340661)
83	11/16/2004	(339730)
84	11/16/2004	(340570)
85	11/17/2004	(340850)
86	11/22/2004	(340787)
87	11/23/2004	(341009)
88	12/09/2004	(343333)
89	12/09/2004	(343311)
90	12/10/2004	(263071)
50		(

91	12/10/2004	(260541)
		(263070)
92	12/10/2004	
93	12/13/2004	(262649)
94	12/14/2004	(343317)
95	12/14/2004	(343284)
96	12/15/2004	(351916)
97	12/16/2004	(336194)
98	12/17/2004	(344033)
99	12/20/2004	(338296)
	12/20/2004	(335252)
100		, ,
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102	12/22/2004	(381756)
103	12/23/2004	(336768)
104	12/28/2004	(344974)
105	12/30/2004	(343622)
106	12/30/2004	(345394)
107	01/03/2005	(343620)
108	01/03/2005	(343624)
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110	02/14/2005	(349294)
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114	02/24/2005	(349397)
115	02/28/2005	(347701)
116	03/24/2005	(419586)
117	04/04/2005	(349690)
118	04/06/2005	(376386)
119	04/06/2005	(376392)
120	04/06/2005	(376398)
121	04/06/2005	(376425)
	04/06/2005	(376432)
122		
123	04/06/2005	(376403)
124	04/08/2005	(376952)
125	04/18/2005	(419587)
126	04/19/2005	(376908)
	04/25/2005	(377968)
127		, ,
128	05/11/2005	(348724)
129	05/16/2005	(380841)
130	05/23/2005	(419588)
131	05/31/2005	(379386)
132	05/31/2005	(374702)
133	05/31/2005	(379380)
134	06/08/2005	(348652)
135	06/13/2005	(345346)
136	06/23/2005	(419589)
137	06/29/2005	(394959)
138	07/19/2005	(440731)
139	07/21/2005	(398102)
140	08/16/2005	(440732)
		, ,
141	08/19/2005	(404318)
142	08/24/2005	(377022)
143	08/24/2005	(405509)
144	08/24/2005	(349399)
	08/24/2005	(405513)
145		. ,
146	08/25/2005	(401920)
147	08/29/2005	(401919)
148	08/30/2005	(401906)
149	09/01/2005	(401916)
		(440733)
150	09/19/2005	, ,
151	10/04/2005	(379884)
152	10/11/2005	(399217)
153	10/21/2005	(433182)
154	10/21/2005	(433183)
		•
155	10/24/2005	(468248)
156	11/28/2005	(468249)
157	12/20/2005	(435369)
158	12/20/2005	(439435)
		,

159	12/20/2005	(468250)
160	12/30/2005	(434386)
161	01/09/2006	(439878)
162	01/23/2006	(468251)
163	01/23/2006	(440227)
		• ,
164	01/24/2006	(440219)
165	01/30/2006	(438969)
166	02/14/2006	(453399)
167	02/14/2006	(453392)
168	02/16/2006	(405519)
169	02/21/2006	(438633)
170	03/03/2006	(457603)
171	03/20/2006	(498075)
172	04/17/2006	(460779)
173	04/19/2006	(451614)
174	04/24/2006	(498076)
175	04/30/2006	(468247)
176	05/12/2006	(464820)
17.7	05/12/2006	(464822)
178	05/12/2006	(464824)
	05/12/2006	(464828)
179	• • • • • • • • • • • • • • • • • • • •	
180	05/12/2006	(464827)
181	05/16/2006	(457449)
182	05/17/2006	(458668)
183	05/18/2006	(451024)
184	05/18/2006	(449724)
185	05/22/2006	(498077)
186	05/31/2006	(466924)
187	05/31/2006	(466929)
188	05/31/2006	(466931)
189	05/31/2006	(466932)
190	06/05/2006	(463415)
191	06/21/2006	(467669)
192	06/21/2006	(480974)
193	06/23/2006	(498078)
194	06/29/2006	(482600)
195	06/29/2006	(482575)
196	06/29/2006	(466692)
197	07/10/2006	(464446)
198	07/10/2006	,
		(467521)
199	07/25/2006	(485504)
200	07/26/2006	(520095)
201	08/17/2006	(497124)
202	08/21/2006	(520096)
203	08/23/2006	(486778)
204	08/31/2006	(480128)
205	09/15/2006	(511153)
206	09/21/2006	(520097)
207	10/23/2006	(544349)
208	10/27/2006	(516020)
209	10/27/2006	(516053)
210	11/08/2006	(518116)
211	11/29/2006	(531921)
212	11/29/2006	(532004)
213	11/29/2006	(544350)
214	12/07/2006	(532264)
215	12/07/2006	(531936)
	12/11/2006	(518239)
216		
217	12/11/2006	(518235)
218	12/27/2006	(544351)
219	01/11/2007	(532283)
220	01/18/2007	(535916)
221	01/18/2007	(536107)
222	01/22/2007	(544352)
223	01/23/2007	(536763)
224	01/30/2007	(536987)
225	01/30/2007	(536993)
226	02/16/2007	(539392)

227	02/16/2007	(539394)
228	02/16/2007	(512464)
229	02/20/2007	(539401)
230	02/21/2007	(539360)
231	02/22/2007	(539395)
232	02/22/2007	(575043)
		, ,
233	02/23/2007	(539396)
234	03/12/2007	(539403)
235	03/12/2007	(539397)
236	03/12/2007	(539398)
		, ,
237	03/26/2007	(575044)
238	04/12/2007	(543396)
239	04/12/2007	(543389)
240	04/12/2007	(543359)
		(543411)
241	04/12/2007	,
242	04/12/2007	(543393)
243	04/19/2007	(575045)
244	05/23/2007	(575046)
245	06/08/2007	(543508)
246	06/13/2007	(563309)
247	06/25/2007	(575047)
248	06/26/2007	(558363)
249	07/05/2007	(565543)
250	07/05/2007	(564044)
251	07/06/2007	(560348)
252	07/23/2007	(575048)
253	08/17/2007	(571117)
	08/17/2007	(571120)
254		•
255	08/17/2007	(571122)
256	08/17/2007	(571113)
257	08/17/2007	(571116)
258	08/22/2007	(573057)
259	08/28/2007	(566965)
260	08/28/2007	(566968)
261	08/29/2007	(572199)
262	08/30/2007	(571497)
263	09/20/2007	(607508)
		, ,
264	09/27/2007	(594475)
265	09/27/2007	(593895)
266	09/28/2007	(565072)
267	10/04/2007	(565781)
		, ,
268	10/16/2007	(594030)
269	10/19/2007	(607509)
270	10/31/2007	(607507)
271	11/01/2007	(598289)
272	11/01/2007	(598293)
273	11/05/2007	(597652)
274	11/06/2007	(599382)
275	11/15/2007	(619438)
276	12/03/2007	(595635)
	12/14/2007	(609886)
277		
278	12/17/2007	(599351)
279	12/17/2007	(610670)
280	12/17/2007	(599355)
281	12/18/2007	(619439)
282	12/20/2007	(611714)
283	12/20/2007	(611710)
284	01/17/2008	(619440)
285	01/28/2008	(595602)
286	01/29/2008	(609295)
287	02/04/2008	(595610)
288	02/13/2008	(615839)
289	02/13/2008	(615859)
290	02/14/2008	(609298)
	02/15/2008	(612072)
291		
292	02/15/2008	(618125)

Date: 07/31/2003 (294923)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)
Failure to meet the limit for one or more permit parameter

Description: Failure to meet the limit for one or more permit parameter

Date: 10/31/2003 (294928)

Self Report? YES
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

1. 50 FAC Chapter 305, SubChapter 1 305,125

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 03/30/2004 (332762)

Self Report? NO Classification: Moderate

Classification:

Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 305, SubChapter F 305.125(17)

Description: NON-RPT VIOS FOR MONIT PER OR PIPE

Date: 05/31/2004 (294920)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 11/16/2004 (339730)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT 18251 and N-011, S.C No. 4

Description: Failure to operate the flare within MAERT limits

Date: 11/17/2004 (340850)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT 18251, S.C No.4

Description: Failure to prevent the leaks from the valves 30HIC4-A/B and caused the release of air

contaminants from the emission point which is not listed in the MAERT.

Date: 11/18/2004 (341009)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: PERMIT 18251, S.C. No.4

Description: Failure to prevent tripping of the boiler (30H5) and relit the burners in a timely manner

and caused the release of air pollutants from the emission point that was not listed in the

MAERT.

Date: 11/22/2004 (340787)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)

Description: Failure to to submit the initial notification of the emissions event within 24 hours after the

start of incident.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: PERMIT 32151, S.C. No.1

Description: Failure to limit the emissions from the scrubber within the MAERT limits.

Date: 12/13/2004 (262649)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PA TCEQ Air Permit No. 18251, SC #4

Description: Solutia failed to prevent moisture from entering the igniter unit on the flare.

Date: 12/20/2004 (335252)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PA TCEQ Air Permit #18251, SC #1
Description: Sterling Chemicals failed to prevent external corrosion on a pipeline.

Date: 12/31/2004 (351918)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1).

TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

Date: 01/03/2005

(343620)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PA TCEQ Air Permit No. 38336, SC #4

Description:

Solutia inadvertently sent steam through the drain line to the process sewer increasing

the pressure in the process sewer tank.

NO Self Report?

Classification: Minor

Classification:

Classification:

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Moderate

Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

Description:

Failure to report an emissions event (Incident #45511) that occurred at the AN7 Unit in a

timely manner.

Date: 02/14/2005

(348976)

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Citation:

Solutia failed to prevent a fire suppression discharge which resulted in a release of 145

pounds (lbs) of Halon 1301 (bromotrifluoromethane).

Date: 04/04/2005

(349690)

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Citation: Description:

The regulated entity failed to prevent a shutdown of the AN2 waste heat boiler due to the

malfunction of the valve positioner.

Self Report?

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Citation: Description:

Solutia, Inc., - Chocolate Bayou Plant failed to identify on the emissions event report the

permit number authorization.

(398102)Date: 07/21/2005

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT TCEQ Permit #18251, SC #4

Description:

Solutia failed to include the facility's authorization limit and number on the final report.

Self Report?

NO

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description:

Solutia failed to include the facility's authorization limit and number on the final report.

Date: 08/24/2005

(377022)

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT 18251 SC 4

Description:

Solutia failed to properly tighten a valve.

Date: 08/24/2005

(349399)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

PA TCEQ Air Permit No. 38998, SC#4

Description:

The regulated entity failed to prevent a leak in a propylene pump.

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description:

failed to identify the permit number representing the propylene pump in the emissions

event report.

Date: 09/30/2005

(468248)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

Date: 10/31/2005

(468249)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

Date: 02/16/2006

(405519)

Self Report?

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

Citation:

Citation:

Description:

Failure to record quarterly opacity observation on Unit ID: 350H1-1 Classification:

Self Report? Citation:

30 TAC Chapter 115, SubChapter B 115.142(1)(E)

Description:

Solutia, Inc., failed to equipt Unit IDs:P-10 and P-13, with a Close-Vent system.

Date: 02/17/2006

(405519)

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

Citation:

Ramt Prov:

PERMIT 0-02325

Description:

Failure to comply with the requirements of 30 TEX. ADMIN. CODE Chapter 106.472(9).

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Moderate

Moderate

Major

Moderate

Moderate

Moderate

Moderate

Moderate

Date: 03/02/2006

(457603)

NO

Self Report? Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT SC 2

Description:

Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak from the heat exchangers into the water of cooling towers E379CT3,

E379CT4, and 70382EG.

Self Report?

2A TWC Chapter 7, SubChapter A 7.101

Citation: Ramt Prov:

ORDER Ordering Provision 3.a.

Description:

Failure to comply with ordering provisions of the Commission Order Docket No. 2002-

0174-AIR-E.

Date: 07/25/2006

(485504)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT No. 18251, Special Condition 4

Rgmt Prov: Description:

Failure to prevent unauthorized emissions.

Self Report?

30 TAC Chapter 101, SubChapter F 101.221(a)

(520096)

Citation: Description:

Failure to maintain the AN2 Flare in good working order during facility operations.

Date: 07/31/2006

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

Citation:

TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

Date: 08/31/2006

Self Report?

(520097)

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

Date: 08/31/2006

(480128)

Self Report?

Classification:

Citation:

30 TAC Chapter 116, SubChapter B 116.116(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Failure to maintain the tank throughputs for the acetic tank and water circulating tank as represented in the permit application dated February 29, 2000 for the TCEQ Permit no.

Self Report? NO Classification: Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

PERMIT 38336, Special Condition 23.E Ramt Prov:

> OP O-02324, Special Condition 18 OP O-02324, Special Condition 1A

Description:

Failure to install caps/plugs/flanges on eight open-ended lines in unit 70ANFUG. Classification:

Self Report?

30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

Citation:

OP O-02324, Special Condition 1A

Description:

Failure to conduct a first attempt at repair on 1 valve within five calendar days after a

leak was detected in the AN 7 Unit.

Self Report?

Classification: Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

PERMIT 38336, Special Condition 12B OP O-02324, Special Condition 18

Description:

Failure to maintain three pilots on the flare 70Z522.

Self Report? NO

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT 38336, Special Condition 4 PERMIT 38336, Special Condition 8A OP O-02324, Special Condition 18

Description:

Failure to maintain the NOx emissions from the boiler 70Z401 within the permit limit in

the AN7 Unit.

Date: 11/29/2006 (532004)

Self Report?

Classification: Moderate

Classification:

Classification:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Citation:

PERMIT No. 38998, Special Condition 4

Rgmt Prov: Description:

Failure to prevent unauthorized emissions.

Date: 12/31/2006

(544352)Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 02/16/2007 (512464)

Self Report?

Classification:

Minor

Moderate

Moderate

Citation:

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

OP FOP O-02321, SC 12 OP FOP O-02321, SC 1A PA NSR 18251 SC 14E PA NSR 18251, SC 12E

Description:

Failure to cap 10 open-ended lines in HRVOC and HAP service.

Date: 02/21/2007

(539360)

Self Report?

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 331, SubChapter D 331.63(e)

Ramt Prov:

PERMIT PROVISION VII.D. Violation of maximum injection flow rate.

Description: Date: 08/31/2007

(607508)

Self Report?

Classification:

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 09/27/2007

Self Report?

(594475)

Classification: Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

OP FOP No. 2324, Spec. Cond 18

OP FOP No. 2324, Spec. Cond. 1A

PERMIT NSR Permit No. 38336, Spec. Cond. 20E

Description:

Failure to seal four (4) open ended lines in VOC service during the compliance period.

Date: 10/31/2007

(619438)

Self Report?

Classification:

Classification:

Moderate

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 01/29/2008

(595602)

Self Report? Citation:

NO

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(C)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

OP O-01258, General Terms and Conditions

Description:

Failure to submit the November 30, 2005 semi-annual deviation report within 30 days

after the end of the reporting period.

Self Report?

Classification:

Minor

Minor

Citation:

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

30 TAC Chapter 122, SubChapter B 122.146(5)(D)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

OP O-01258, General Terms and Conditions

Description:

Failure to submit a complete semi-annual report and annual compliance certification containing all terms and conditions of the permit for which compliance was not achieved.

F. Environmental audits.

Notice of Intent Date: 09/23/2004 (347742)

No DOV Associated

Notice of Intent Date: 01/03/2006 (453378)

(559025)

No DOV Associated

Notice of Intent Date: 04/07/2006

(462917)

No DOV Associated

Notice of Intent Date:

(481532)05/25/2006

Disclosure Date:

11/14/2006

04/23/2007

Viol. Classification: Minor

Rgmt Prov: PERMIT 32151, SC 8A

Description: Failure to notify the regional office 45 days prior to schedule stack sampling for scrubber 83S14 and 83S6.

Notice of Intent Date:

No DOV Associated

Type of environmental management systems (EMSs). G.

N/A

Voluntary on-site compliance assessment dates. Н.

Participation in a voluntary pollution reduction program. 1.

N/A

Early compliance.

N/A

Sites Outside of Texas

N/A

Ę	Penalty Calculation	n Worksheet (PCW)	
Policy Revision 2 (Sep	lember 2002)	PCW Re	evision June 12, 2008
CEQ			
DATES Assigned	23-Jun-2008	<u> 1987 - British da British da bar</u> i British da bari	sir san ƙasilta
PCW	2-Jul-2008 Screening 2-Jul-2008	EPA Due 26-Apr-2009	
RESPONDENT/FACILITY	INFORMATION		
Respondent			
Reg. Ent. Ref. No.			
Facility/Site Region	12-Houston	Major/Minor Source Major	
1 4011113/10110 11091011			***************************************
CASE INFORMATION			
Enf./Case ID No.		No. of Violations 5	
Docket No.	2008-0062-AIR-E	Order Type 1660	
Media Program(s)	Air	Government/Non-Profit No	
Multi-Media		Enf. Coordinator Bryan Elliott	
		EC's Team Enforcement Team	4
Multi-Media Admin. Penalty \$ I	_imit Minimum \$0 Maximum		4
		### C's Team Enforcement Team \$10,000	4
	imit Minimum \$0 Maximum Penalty Calcula	### C's Team Enforcement Team \$10,000	4
Admin. Penalty \$ l		\$10,000 EC's Team Enforcement Team	\$15,100
Admin. Penalty \$ I	Penalty Calcula TY (Sum of violation base penalti	\$10,000 EC's Team Enforcement Team	
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-)	Penalty Calcula TY (Sum of violation base penaltion to SUBTOTAL 1	\$10,000 EC's Team Enforcement Team ation Section Subtotal 1	
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain	Penalty Calcula TY (Sum of violation base penaltion TO SUBTOTAL 1 ned by multiplying the Total Base Penalty (Subtotal 1) be	\$10,000 EC's Team Enforcement Team \$10,000 Section es) Subtotal 1 y the indicated percentage.	\$15,100
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-)	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication base penalty (Subtotal 1) being the Total Base Penalty (Subtotal 1) being 188.0%	\$10,000 EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Enhancement Subtotals 2, 3, & 7	
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication base Penalty (Subtotal 1) bory 188.0% The penalty was enhanced due to 16 NO	\$10,000 EC's Team Enforcement Team \$10,000 Section es) Subtotal 1 y the indicated percentage. Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19	\$15,100
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain	Penalty Calcula TY (Sum of violation base penaltical TO SUBTOTAL 1 The doty multiplying the Total Base Penalty (Subtotal 1) bory 188.0% The penalty was enhanced due to 16 NO NOVs for dissimilar violations, and four 16	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Use Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty	\$15,100
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication base Penalty (Subtotal 1) bory 188.0% The penalty was enhanced due to 16 NO	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Sentancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty and 2 DOVs.	\$15,100 \$28,388
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication by 188.0% The penalty was enhanced due to 16 NO NOVs for dissimilar violations, and four 16 was reduced due to 6 NOAs	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Use Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty	\$15,100
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo Notes Culpability	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication by the Total Base Penalty (Subtotal 1) by 188.0% The penalty was enhanced due to 16 NO NOVs for dissimilar violations, and four 16 was reduced due to 6 NOAs	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty and 2 DOVs. Enhancement Subtotal 4	\$15,100 \$28,388
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication by 188.0% The penalty was enhanced due to 16 NO NOVs for dissimilar violations, and four 16 was reduced due to 6 NOAs	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty and 2 DOVs. Enhancement Subtotal 4	\$15,100 \$28,388
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo Notes Culpability	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication by the Total Base Penalty (Subtotal 1) by 188.0% The penalty was enhanced due to 16 NO NOVs for dissimilar violations, and four 16 was reduced due to 6 NOAs	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty and 2 DOVs. Enhancement Subtotal 4	\$15,100 \$28,388
Admin. Penalty \$ I TOTAL BASE PENAL ADJUSTMENTS (+/-) Subtotals 2-7 are obtain Compliance Histo Notes Culpability Notes	Penalty Calcula TY (Sum of violation base penaltication base penaltication base penaltication base penaltication base penaltication by the Total Base Penalty (Subtotal 1) by 188.0% The penalty was enhanced due to 16 NO NOVs for dissimilar violations, and four 16 was reduced due to 6 NOAs	EC's Team Enforcement Team \$10,000 ation Section es) Subtotal 1 y the indicated percentage. Enhancement Subtotals 2, 3, & 7 Vs for similar violations, 19 60 style orders. The penalty and 2 DOVs. Enhancement Subtotal 4	\$15,100 \$28,388

Approx. Cost of Compliance

OTHER FACTORS AS JUSTICE MAY REQUIRE

Reduces or enhances the Final Subtotal by the indicated percentage.

SUM OF SUBTOTALS 1-7

Notes

Notes

PAYABLE PENALTY

DEFERRAL

STATUTORY LIMIT ADJUSTMENT

Final Assessed Penalty \$39,088 0.0% Reduction Adjustment \$0 Reduces the Final Assessed Penalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.) \$39,088

Final Penalty Amount

Final Subtotal

Adjustment

0.0%

\$43,488

\$43,488

\$0

Screening Date 2-Jul-2008

Docket No. 2008-0062-AIR-E

PCW

Respondent Solutia Inc.

Case ID No. 35189

Reg. Ent. Reference No. RN100238682

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Policy Revision 2 (September 2002)
. PCW Revision June 12, 2008

Compliance History Worksheet

Component	Number of	Enter Number Here	Adjust.	
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	16	80%	
	Other written NOVs	19	38%	
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	4	80%	
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%	
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%	
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%	
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%	
Emissions	Chronic excessive emissions events (number of events)	0	0%	
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		-6%	
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	2	-4%	
	Plea	se Enter Yes or No		
	Environmental management systems in place for one year or more	No	0%	
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
Calor	Participation in a voluntary pollution reduction program	No	0%	
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
	Adjustment P	ercentage (Su	ıbtotal 2)	18
peat Violator (Su	d i i i i i i i i i i i i i i i i i i i			Mañ.
No	Adjustment P	ercentage (Su	ibtotal 3) [_	(
	Person Classification (Subtotal 7)	r Budul Bets Afrèce		Poj
Average P	erformer Adjustment P	ercentage (Su	btotal 7)	(
mpliance History	/ Summary			Eq.
Compliance History Notes	The penalty was enhanced due to 16 NOVs for similar violations, 19 NOVs for dissimilar violations, 1660 style orders. The penalty was reduced due to 6 NOAs and 2 DOVs.	ations, and four		
	Tatal Adicates and Daniel	/Cb.441-	~	<u> </u>
	Total Adjustment Percentage	(Suptotais 2	, J, G. /)	18

Screening Date	2-Jul-2008	Docket No. 2008-0062-AIR-E	PCW
Respondent	Solutia Inc.	Policy R	evision 2 (September 2002)
Case ID No.	35189	P	CW Revision June 12, 2008
Reg. Ent. Reference No.			
Media [Statute]			
Enf. Coordinator Violation Number			
			1
Rule Cite(s)		dmin. Code §§ 101.20(3) and 116.115(c), Tex. Health & Safety Code § 85(b) and Permit No. 38336/PSD-TX-910, Special Condition No. 4	
Violation Description	stack test con Process Air ("NOx") were	oly with permitted emissions limits. Specifically, during a reference method ducted on March 28, 2008, it was determined that emissions from the AN-7 Startup Heater, emission point No. ("EPN") 70H101-2, for nitrogen oxides 8.62 pounds per hour ("lbs/hr") and emissions for carbon monoxide ("CO") //hr. The emission limits for this EPN are 4.50 lbs/hr for NOx and 6.0 lbs/hr for CO.	
		Base Penalty	\$10,000
>> Environmental, Property ar	nd Human H	ealth Matrix Harm	
Release		Moderate Minor	
OR Actual		X	
Potential		Percent 25%	
>>Programmatic Matrix			
Falsification	Major	Moderate Minor	
		Percent 0%	
	<u> </u>		ī
Matrix Notes Human health		nent has been exposed to an insignificant amount of pollutants that do not s protective of human health or environmental receptors.	
		Adjustment \$7,500	
a linka on La veza sida orde la			
			\$2,500
Violation Events			
e tradición de la companya del companya de la companya del companya de la companya del la companya de la compan			
Number of V	iolation Events	2 96 Number of violation days	
	daily		
	monthly		
mark only one	quarterly	X Violation Base Penalty	\$5,000
with an x	semiannual		
	annual single event		
	single event		
Two guartesh		manufad based as the new security of state that a March 00,0000 to 11	
Two quarterly	events are reco	mmended based on the non-compliant stack test on March 28, 2008 to the July 2, 2008 screening date.	

Good Faith Efforts to Comply		0.0% Reduction	\$0
		Before NOV NOV to EDPRP/Settlement Offer	
	Extraordinary		
	Ordinary		
	N/A	X (mark with x)	
·	Notes	The Respondent does not meet the good faith criteria for this violation.	
	-	Violation Subtotal	\$5,000
Economic Benefit (EB) for this	violation	Statutory Limit Test	
Estimate	d EB Amount[\$213 Violation Final Penalty Total	\$14,400
and the control of th		This violation Final Assessed Penalty (adjusted for limits)	\$14,400

	E	conomic l	3enefit ₩	/orks	heet		
Respondent		and the second s	to the second	· marker · · · · · · · · · · · · · · · · · · ·	er i i dhe mendament in a ini i i		ara e e e e e e e e e e e e e e e e e e
Case ID No.							
Reg. Ent. Reference No.	RN100238682						· · · · · · · · · · · · · · · · · · ·
Media	⊩Air					Percent Interest	Years of
Violation No.	. 1					rercent interest	Depreciation
				rayeta		5.0	15
						·	·····
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$			الشادي	A Conference of	er i er	
					the second second		
Delayed Costs				<u> </u>		<u> </u>	<u>a santa di u</u>
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a "	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	all the in/all the	\$0
						25000000000000000000000000000000000000	
Permit Costs				0.00	\$0 \$0	i n/a	\$0
Permit Costs Other (as needed)	\$5,000	28-Mar-2008	2-Feb-2009	0.00	\$0 \$213	n/a n/a	\$0 \$213
Other (as needed) Notes for DELAYED costs	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that	\$0 \$213 d limits for emiss corrective action	ions from 70H101-2.	\$0 \$213 Date Required empleted.
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that	\$0 \$213 d limits for emiss corrective action tem (except for	ions from 70H101-2. is estimated to be co	\$0 \$213 Date Required empleted.
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that	\$0 \$213 d limits for emiss corrective action tem (except for \$0	ions from 70H101-2. is estimated to be co	\$0 \$213 Date Required empleted.
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0	ions from 70H101-2. is estimated to be co	\$0 \$213 Date Required ompleted.
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that entering i	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0	ions from 70H101-2. is estimated to be co	\$0 \$213 Date Required impleted.
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sosts) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sots) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sots) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sots) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sots) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sots) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated exp	ense to demonstrati te of the stack test.	e compliance with Final Date is the	0.00 0.85 n permitte date that 0.00 0.00 0.00 0.00 0.00	\$0 \$213 d limits for emiss corrective action tem (except for \$0 \$0 \$0 \$0	ions from 70H101-2. is estimated to be coone-time avoided coone-time a	\$0 \$213 Date Required impleted. sots) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	2-Jul-2008	Docket No. 2008-0062-AIR-E	PCW
Respondent	Solutia Inc.	Policy Rev	rision 2 (September 2002)
Case ID No.		PCV	W Revision June 12, 2008
Reg. Ent. Reference No.		·	
Media [Statute]			
Enf. Coordinator Violation Number			
Violation Number Rule Cite(s)		n. Code § 116.115(c), Tex. Health & Safety Code § 382.085(b) and Permit	
Kule Oite(s)	30 Tex. Admi	No. 18251, Special Condition No. 4	-
Violation Description	February 29, 2 hour and 4 cyanide ("HCi lbs/hr for h emissions ev	ent unauthorized emissions. Specifically, an emissions event occurred on 2008 due to a preventable electrical spike at EPN 31H4, which lasted for one 3 minutes and resulted in the release of 15.20 pounds ("lbs") of hydogen N") and 526.80 lbs of propylene. The emission limits for this EPN are 1.26 dCN and 4.01 lbs/hr for volatile organic compounds ("VOC"). Since this ent could have been avoided by good design, operation, and maintenance d not meet the demonstrations for an affirmative defense in 30 Tex. Admin. Code § 101.222.	
		Base Penalty	\$10,000
>> Environmental, Property an	id Hilman üc	alth Matrix	
	a ruman 115	Harm	
Release	Major	Moderate Minor	
OR Actual		X	
Potential		Percent 25%	
>>Programmatic Matrix			
Falsification	Major	Moderate Minor .	
		Percent 0%	
		ent was exposed to insignificant amounts of pollutants which did not exceed man health or environmental receptors as a result of the violation.	
		Adjustment \$7,500	
and the state of the second	and distributed the production at a		
•			\$2,500
Violation Events	J-5. (10) N. T-477		
Number of Vi	olation Events	1 Number of violation days	
mark only one with an x	daily monthly quarterly semiannual; annual	X Violation Base Penalty	\$2,500
	single event		
·		One quarterly event is recommended.	,
Good Faith Efforts to Comply		0.0% Reduction	\$0
ero en		Before NOV NOV to EDPRP/Settlement Offer	
	Extraordinary		
	Ordinary		
•	N/A L	X (mark with x)	
	Notes	The Respondent does not meet the good faith criteria for this violation.	
		Violation Subtotal	\$2,500
Economic Benefit (EB) for this	violation	Statutory Limit Test	
Estimated	d EB Amount	\$48 Violation Final Penalty Total	\$7,200
		This violation Final Assessed Barelly (adjusted for the control	67.000
		This violation Final Assessed Penalty (adjusted for limits)	\$7,200

		conomic	Benefit W	orks	heet		
Respondent	t Solutia Inc.	and I assert and the Grand	and the same of th	*	and the state of t		· · · · · · · · ·
Case ID No							
Reg. Ent. Reference No							
Media							Years of
Violation No	• • • • • • • • • • • • • • • • • • • •					Percent Interest	Depreciation
Violation No	• 4	The second second	en and and and and an ex-	n n n n	erin en en		• • • • • • • • • • • • • • • • • • • •
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	1 No commas or \$	landari da santa da s	The second of th	1.31	The second secon		
				aner .		· · · · · · · · · · · · · · · · · · ·	etis ve aktig
Delayed Costs	.			1 000	<u> </u>	T 60 T	60
Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Buildings				0.00	\$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0 \$0
Engineering/construction				0.00	\$0	n/a	\$0 \$0
Land Record Keeping System	ļ	<u> </u>		0.00	\$0	n/a	\$0 \$0
Training/Sampling		<u> </u>		0.00	\$0	n/a	\$0 .
Remediation/Disposal				0.00	\$0	n/a is t	\$0
•		<u> </u>					
Parmit Costs		II .	II	ו מממו	1 50	The War No American Market	\$0
Permit Costs Other (as needed)	\$1,000 Estimated	29-Feb-2008	15-Feb-2009 oversight and man	0.00 0.96 agement	\$0 \$48 practices designe	n/a n/a ed to ensure proper i	\$0 \$48 maintenance
Other (as needed) Notes for DELAYED costs	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement he date of of comp	\$48 practices designe of the emissions e liance.	ed to ensure proper i	\$48 maintenance is the expected
Other (as needed)	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement he date of comp	\$48 practices designed the emissions eliance. item (except for	ed to ensure proper revent and Final Date	\$48 maintenance is the expected osts)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement the date of componentering	\$48 practices designed for the emissions eliance. item (except for \$0	ed to ensure proper revent and Final Date	\$48 maintenance is the expected osts)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	agement the date of composite o	\$48 practices designed from the emissions eliance. item (except for \$0 \$0	ed to ensure proper revent and Final Date	\$48 maintenance is the expected osts) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	agement the date of composite o	\$48 practices designed for the emissions eliance. item (except for \$0 \$0 \$0	ed to ensure proper invent and Final Date one-time avoided c \$0 \$0 \$0	\$48 maintenance is the expected osts) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	o.96 agement the date of composition entering 0.00 0.00 0.00 0.00	\$48 practices designed for the emissions eliance. \$0 \$0 \$0 \$0 \$0	ed to ensure proper rivent and Final Date one-time avoided c \$0 \$0 \$0 \$0	\$48 maintenance is the expected sosts) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement the date of composition	\$48 practices designed for the emissions eliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ed to ensure proper revent and Final Date one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$48 maintenance is the expected osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement he date of composition	\$48 practices designed for the emissions eliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ed to ensure proper revent and Final Date one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$48 maintenance is the expected sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement the date of composition	\$48 practices designed for the emissions eliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ed to ensure proper revent and Final Date one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$48 maintenance is the expected osts) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated of practices are f	cost for additional of the control o	oversight and man uired is based on t date	0.96 agement he date of composition	\$48 practices designed for the emissions eliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ed to ensure proper revent and Final Date one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$48 maintenance is the expected sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$

Screening Date	2-Jul-2008	Docket No. 2008-00	62-AIR-E	PCW
Respondent	Solutia Inc.		Policy R	evision 2 (September 2002)
Case ID No.			P	CW Revision June 12, 2008
Reg. Ent. Reference No.				
Media [Statute]	Air			
Enf. Coordinator	Bryan Elliott			,
Violation Number	3			1
Rule Cite(s)		i.115(c), Tex. Health & Safety Code (lo. 18251, Special Condition No. 4	§ 382.085(b) and Permit	
		ed emissions. Specifically, an emis		
Violation Description	minutes and resulted in the EPN are 4.01 lbs/hr for VOC design, operation, and mail	eventable electrical spike at EPN 31 release of 166 lbs of propylene. The Since this emissions event could hattenance practices, it did not meet the defense in 30 Tex. Admin. Code § 1	e emission limits for this ave been avoided by good e demonstrations for an	
THE PROPERTY OF THE PROPERTY O			Base Penalty	\$10,000
>> Environmental, Property and	o muman meaith Watrix Harm	Antigories and a second se		
Release	Major Moderate	Minor		
OR Actual		x		
Potential		Percent	25%	
			·	
>>Programmatic Matrix Falsification	Moior Modorato	Minor		
Faisilication	Major Moderate	Minor Percent	0%	
		rescent	0 /6	
Matrix Human health o	or the environment was expos	ed to insignificant amounts of polluta	ints which did not exceed	
Notes levels	protective of human health or	environmental receptors as a result	of the violation.	
		Adjustme Adjustme	nt \$7,500	
name Webste				•
L september 1981				\$2,500
Violation Events				
t de la companya de La companya de la companya de	The first of the control of the cont			
Number of Vio	olation Events 1	1 Number	of violation days	
Section 2	aan			
VA STREET, CARLOS STR	daily monthly		•	
mark only one	quarterly x		Violation Base Penalty	\$2,500
with an x	semiannual			42,000
	annual			
Section 1	single event			
	· · · · · · · · · · · · · · · · · · ·			
	One quarte	erly event is recommended.		
	One quarte	any event is recommended.		
<u> </u>				
Good Faith Efforts to Comply		Reduction	Angest C. Colonia de	\$0
		NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary			
	. N/A <u>x</u> (ı	mark with x)		
	Notes The Respond	dent does not meet the good faith crit	teria for this	
	140.65	violation.	·.	
	<u> </u>			
·			Violation Subtotal	\$2,500
	Total and the second se			14
Economic Benefit (EB) for this	violation	Statuto	ory Limit Test	
Estimated	EB Amount	\$48 Viola	tion Final Penalty Total	\$7,200
				Φ1,200
	ETT 6 JULY 100 HOUSE STEER SHOWN SHOWS AND	This violation Final Assessed Pena	alty (adjusted for limits)	\$7,200
F 보고 그렇다 이 항상 등이 되면 말해 되었다. 경험적 관련 전쟁을 전했다.	· · · · · · · · · · · · · · · · · · ·		MANAGER STEPS SERVED SERVED STEPS	CONTRACTOR OF THE SHOP OF THE SERVICE OF THE SERVIC

	E	conomic	Benefit W	orks	sheet		
Respondent Case ID No. Reg. Ent. Reference No.	35189	and the first of t			and the second s	and the second	The state of the state of
Media Violation No.	Air					Percent Interest	Years of Depreciation
					pulse and	5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$		Section 1				
Delayed Costs	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		er i seringggas s	<u>.</u> - 1 14			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	is in	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	i / ₩ 11 n/a w 12 w	\$0
Other (as needed)	\$1,000	2-Mar-2008	15-Feb-2009	0.96	\$48	n/a	\$48
Notes for DELAYED costs						ed to ensure proper in vent and Final Date	
		'		of comp			•
Avoided Costs	ANN	UALIZE [1] avoid		of comp	item (except for	one-time avoided c	osts)
	ANN	UALIZE [1] avoid		of comp ntering 0.00	item (except for	\$0	osts)
Avoided Costs Disposal Personnel	ANN	UALIZE [1] avoid		of composition of com	item (except for \$0 \$0	\$0 \$0	osts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	ANN	UALIZE [1] avoid		of comp ntering 0.00 0.00	item (except for \$0 \$0 \$0	\$0 \$0 \$0	s0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	ANN	UALIZE [1] avoid		ntering 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANN	UALIZE [1] avoid		ntering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	s0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANN	UALIZE [1] avoid		ntering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANN	UALIZE [1] avoid		ntering 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	so s
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANN	UALIZE [1] avoid		ntering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	2-Jul-2008	Docket No. 2008-0062-AIR-E	PCW
Respondent		Policy R	evision 2 (September 2002)
Case ID No.			CW Revision June 12, 2008
Reg. Ent. Reference No. Media [Statute]			
Enf. Coordinator			
Violation Number			
Rule Cite(s)	30 Tex. Adm	in. Code § 116.115(c), Tex. Health & Safety Code § 382.085(b) and Permit No. 18251, Special Condition No. 4	
	Failed to prev	vent unauthorized emissions. Specifically, an emissions event occurred on	
Violation Description	March 27, 200 one hour and and 61 lbs of CO, and 1.26 l design, operati	38 due to a loss of air flow from operator error at EPN 30H5, which lasted for 51 minutes and resulted in the release of 4,057 lbs of VOC, 4,714 lbs of CO, HCN. The emission limits for this EPN are 3.57 lbs/hr for VOC, 31 lbs/hr for bs/hr for HCN. Since this emissions event could have been avoided by good ion, and maintenance practices, and was improperly reported, it did not meet nstrations for an affirmative defense in 30 Tex. Admin. Code § 101.222.	
		Base Penalty	\$10,000
>> Environmental, Property an	d Human H	ealth Matrix	
		Harm	
Release OR Actual	Major	Moderate Minor	
Potential		X Percent 50%	
>>Programmatic Matrix	Moior	Moderate	•
Falsification	Major II	Moderate Minor Percent 0%	
		nent was exposed to significant amounts of pollutants which did not exceed uman health or environmental receptors as a result of the violation.	
	a A a Set N	#5,000	
•			\$5,000
Violation Events			
Number of Vie	olation Events	1 Number of violation days	
mark only one with an x	daily monthly quarterly semiannual	Violation Base Penalty	\$5,000
	annual single event		•
	eniale evenif	X	
		One single event is recommended.	
Good Faith Efforts to Comply	16.00 DM 27.6	0.0% Reduction	\$0
	Extraordinary	Before NOV NOV to EDPRP/Settlement Offer	
	Ordinary		
	N/A	X (mark with x)	
	Notes	The Respondent does not meet the good faith criteria for this violation.	`
		Violation Subtotal	\$5,000
Economic Benefit (EB) for this	violation 🐇	Statutory Limit Test	\$5,000
er verticente de la companya del companya del companya de la companya del la companya de la comp	IEB Amount	\$45 Violation Final Penalty Total	\$14,400
		This violation Final Assessed Penalty (adjusted for limits)	\$10,000
			Control of Control Operation Control

	E (conomic	Benefit W	orks	sheet		
Respondent	Solutia Inc.						· · · · · · · · · · · · · · · · · · ·
Case ID No.	35189						
Reg. Ent. Reference No.	RN100238682						
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation ito.	' "		ang saminyan can				
			National Control			5.0	15]
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	Section 1					
Delayed Costs	i i i i i i i i i i i i i i i i i i i					$\sigma_{i,k} = \sigma_{i,k} + \sigma_{i,k} + \sigma_{i,k}$	
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
, Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$1,000	27-Mar-2008	15-Feb-2009	0.89	\$45	in/a vin/a	\$45
,	Estimated cos	t for additional ov	ersight and manag		ractices designed	to ensure proper ma	
Notes for DELAYED costs	reporting practi	ces are followed.	Date Required is to expected	ement p pased on date of	the date of the er compliance.	to ensure proper ma nissions event and F	aintenance and Final Date is the
Notes for DELAYED costs Avoided Costs	reporting practi	ces are followed.	Date Required is to expected	ement p ased on date of	the date of the er compliance. Item (except for	to ensure proper ma nissions event and F one-time avoided o	aintenance and Final Date is the costs)
Notes for DELAYED costs Avoided Costs Disposal	reporting practi	ces are followed.	Date Required is to expected	ement p eased on date of entering	the date of the er compliance. item (except for	to ensure proper ma nissions event and F one-time avoided o	aintenance and Final Date is the costs)
Notes for DELAYED costs Avoided Costs Disposal Personnel	reporting practi	ces are followed.	Date Required is to expected	ement p pased on date of o	the date of the er compliance. Item (except for \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0	aintenance and Final Date is the costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	reporting practi	ces are followed.	Date Required is to expected	ement p pased on date of o	ithe date of the ercompliance. item (except for \$0 \$0 \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0 \$0 \$0	aintenance and Final Date is the costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	reporting practi	ces are followed.	Date Required is to expected	ement plased on date of ontering 0.00 0.00 0.00 0.00	the date of the ercompliance. Item (except for \$0 \$0 \$0 \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0 \$0 \$0 \$0	aintenance and Final Date is the sosts) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	reporting practi	ces are followed.	Date Required is to expected	ement plased on date of ontering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	the date of the ercompliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	sintenance and Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	reporting practi	ces are followed.	Date Required is to expected	ement p pased on date of 0.00 0.00 0.00 0.00 0.00 0.00	the date of the ercompliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sintenance and Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	reporting practi	ces are followed.	Date Required is to expected	ement plased on date of ontering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	the date of the ercompliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	aintenance and Final Date is the sosts) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	reporting practi	ces are followed.	Date Required is to expected	ement p pased on date of 0.00 0.00 0.00 0.00 0.00 0.00	the date of the ercompliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to ensure proper manissions event and F one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sintenance and Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	2-Jul-2008	Docket No. 2008-0062-AIR-E	PCW
Respondent		Policy R	evision 2 (September 2002)
Case ID No.			CW Revision June 12, 2008
Reg. Ent. Reference No.			
Media [Statute] Enf. Coordinator			
Violation Number			
Rule Cite(s)	<u></u>	dmin. Code § 101.201(b)(1) and Tex. Health & Safety Code § 382.085(b)	
	30 Tex. AC	inini. Code § 101.201(b)(1) and Tex. Health & Salety Code § 302.000(b)	
Violation Description		erly report an emissions event. Specifically, the final report for the March 27, ns event did not contain the authorized limits for several pollutants that were involved in the event.	
		Base Penalty	\$10,000
>> Environmental, Property a	nd Human H		
Release	Major	Harm · Moderate Minor	
OR Actual		Wind	
Potential		Percent 0%	
Constitution of the second			,
>>Programmatic Matrix Falsification	Major	Moderate Minor	
nga (X Percent 1%	
			•
Matrix		the 2000 of the order	
Notes .	Les	ss than 30% of the rule requirement was not met.	
			
		Adjustment \$9,900	
,			\$100
			\$100
Violation Events			
Number of V	iolation Events	1 Number of violation days	
Trainesi or v		1 Trumbol of Violation days	
Annany Te	daily		
mark only one	monthly:	Violation Book Bonelty	\$100
mark only one with an x	quarterly semiannual	Violation Base Penalty	. φ100
	annual		
	single event	х	
		One single event is recommended.	
Good Faith Efforts to Comply		0.0% Reduction	\$0
	Maria ya 1841 L	Before NOV NOV to EDPRP/Settlement Offer	ΨΟ
	Extraordinary		
	Ordinary		
	N/A	X (mark with x)	
	Notes	The Respondent does not meet the good faith criteria for this violation.	
	L	Violation Subtotal	\$100
Economic Benefit (EB) for this	violation	Statutory Limit Test	
Estimate	d EB Amount[\$0 Violation Final Penalty Total	\$288
		This violation Final Assessed Penalty (adjusted for limits)	\$288
		i ins violation i inal Assessed Penalty (adjusted for limits)	\$288

	E	conomic E	Benefit W	orks	sheet		
Respondent	t Solutia Inc.	in manta o Section			and the second		* . * . ***
Case ID No	. 35189						
Reg. Ent. Reference No	-						
Media							Years of
						Percent Interest	Depreciation
Violation No	. 5	and the second s		en e algar		1	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	n No commas or \$			45.75			
	. 110 001111120 01.4	and the first of the energy			a to 950 c		
Delayed Costs							700000000000000000000000000000000000000
Equipment	^			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	Marine n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a∺	\$0
Other (as needed)				0.00	\$0	n/a was	\$0
Notes for DELAYED costs		E	conomic Benefit	is includ	ded in violation no.	4.	
	ANN		-16-5-16-1-16-16-16-16-16-16-16-16-16-16-16-1				
Avoided Costs	ANN	UALIZE [1] avoide	d costs before e			one-time avoided o	
Avoided Costs	3 ANN	UALIZE [1] avoide	d costs before e	0.00	\$0	\$0	\$0
Avoided Costs Disposal Personnel	s ANN	UALIZE [1] avoide	d costs before e	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	5 ANN	UALIZE [1] avoide	d costs before e	0.00 0.00 0.00	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	5 ANN	UALIZE [1] avoide	d costs before e	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	s ANN	UALIZE [1] avoide	d costs before e	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	5 ANN	UALIZE [1] avoide	d costs before e	0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	s ANN	UALIZE [1] avoide	d costs before e	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	S ANN	UALIZE [1] avoide	d costs before e	0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0

Compliance History

CN600132856 Customer/Respondent/Owner-Operator: Solutia Inc. Classification: AVERAGE Rating: 2.30 Regulated Entity: RN100238682 CHOCOLATE BAYOU PLANT Classification: AVERAGE Site Rating: 1.61 ID Number(s): AIR OPERATING PERMITS ACCOUNT NUMBER BL0038U AIR OPERATING PERMITS PERMIT 1258 AIR OPERATING PERMITS PERMIT 2317 AIR OPERATING PERMITS PERMIT 2318 AIR OPERATING PERMITS **PERMIT** 2319 AIR OPERATING PERMITS PERMIT 2320 AIR OPERATING PERMITS PERMIT 2321 AIR OPERATING PERMITS PERMIT 2322 AIR OPERATING PERMITS PERMIT 2323 AIR OPERATING PERMITS PERMIT 2324 AIR OPERATING PERMITS PERMIT 2325 PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0200049 WASTEWATER PERMIT WQ000001000 WASTEWATER PERMIT TPDES0003875 WASTEWATER PERMIT TX0003875 AIR NEW SOURCE PERMITS PERMIT 2271 AIR NEW SOURCE PERMITS PERMIT 3046 AIR NEW SOURCE PERMITS PERMIT 5065 AIR NEW SOURCE PERMITS PERMIT 5084 AIR NEW SOURCE PERMITS PERMIT 5336 AIR NEW SOURCE PERMITS PERMIT 6534 AIR NEW SOURCE PERMITS PERMIT 8372 AIR NEW SOURCE PERMITS PERMIT 14488 AIR NEW SOURCE PERMITS PERMIT 18130 AIR NEW SOURCE PERMITS PERMIT 18251 AIR NEW SOURCE PERMITS **PERMIT** 28694 AIR NEW SOURCE PERMITS PERMIT 32151 AIR NEW SOURCE PERMITS **PERMIT** 34029 AIR NEW SOURCE PERMITS PERMIT 38336 AIR NEW SOURCE PERMITS PERMIT 38998 AIR NEW SOURCE PERMITS PERMIT 39171 AIR NEW SOURCE PERMITS **PERMIT** 39643 AIR NEW SOURCE PERMITS **PERMIT** 48895 AIR NEW SOURCE PERMITS ACCOUNT NUMBER BL0038U AIR NEW SOURCE PERMITS REGISTRATION 75639 AIR NEW SOURCE PERMITS REGISTRATION 76211 AIR NEW SOURCE PERMITS AFS NUM 4803900009 AIR NEW SOURCE PERMITS REGISTRATION 71232 AIR NEW SOURCE PERMITS EPA ID PSDTX307A AIR NEW SOURCE PERMITS REGISTRATION 71063 AIR NEW SOURCE PERMITS EPA ID PSDTXP910 AIR NEW SOURCE PERMITS REGISTRATION 72689 AIR NEW SOURCE PERMITS REGISTRATION 72545 AIR NEW SOURCE PERMITS REGISTRATION 74040 AIR NEW SOURCE PERMITS REGISTRATION 73707 AIR NEW SOURCE PERMITS REGISTRATION 74788 AIR NEW SOURCE PERMITS REGISTRATION 75318 AIR NEW SOURCE PERMITS REGISTRATION 77064 AIR NEW SOURCE PERMITS REGISTRATION 77079 AIR NEW SOURCE PERMITS REGISTRATION 78148 AIR NEW SOURCE PERMITS REGISTRATION 78728 AIR NEW SOURCE PERMITS REGISTRATION 79253 AIR NEW SOURCE PERMITS REGISTRATION 80379 AIR NEW SOURCE PERMITS REGISTRATION 80616 AIR NEW SOURCE PERMITS REGISTRATION 83875 AIR NEW SOURCE PERMITS REGISTRATION 83109 RADIOACTIVE WASTE DISPOSAL LICENSE RW0219 UNDERGROUND INJECTION CONTROL PERMIT WDW013 UNDERGROUND INJECTION CONTROL PERMIT WDW224 UNDERGROUND INJECTION CONTROL PERMIT WDW318 UNDERGROUND INJECTION CONTROL PERMIT WDW326 UNDERGROUND INJECTION CONTROL PERMIT WDW359 UNDERGROUND INJECTION CONTROL PERMIT WDW002 UNDERGROUND INJECTION CONTROL PERMIT WDW001 INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD001700806 **PROCESSING** INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # 30138 GENERATION (SWR)

INDUSTRIAL AND HAZARDOUS WASTE

EPA ID

TXD001700806

GENERATION

STORMWATER WATER LICENSING

INDUSTRIAL AND HAZARDOUS WASTE

COMPLIANCE PLANS

IHW CORRECTIVE ACTION

SOLID WASTE REGISTRATION # (SWR)

30138

INDUSTRIAL AND HAZARDOUS WASTE

POST CLOSURE

INDUSTRIAL AND HAZARDOUS WASTE

STORAGE

INDUSTRIAL AND HAZARDOUS WASTE

PERMIT PERMIT

PERMIT

LICENSE

PERMIT

PERMIT

50189

TXR050891

0200049

50189

50189

STORAGE

50189

Location:

FM 2917, ALVIN, TX, 77512

Rating Date: September 01 07 Repeat Violator: NO

TCFO Region:

REGION 12 - HOUSTON

Date Compliance History Prepared:

July 03, 2008

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

July 02, 2003 to July 02, 2008

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Bryan Elliott

Phone:

239-6162

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? 2. Has there been a (known) change in ownership of the site during the compliance period?

Yes Νo

3. If Yes, who is the current owner? 4. If Yes, who was/were the prior owner(s)? N/A

N/A

5. When did the change(s) in ownership occur?

N/A

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 10/10/2003

ADMINORDER 2002-0174-AIR-E

Classification: Moderate

30 TAC Chapter 113, SubChapter C 113,120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: SC 2 PERMIT

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a

leak from the heat exchangers into the water of cooling towers E379CT3, E379CT4, and 70382EG.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.120(b)(9)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to notify the TCEQ in writing 30 days in advance of seal gap measurements taken in affiliation with the 1999, 2000, and 2001 annual external floating roof tank inspection of tanks 332T1-1 and

332T1-2.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116,115(c)

40 CFR Part 63, Subpart G 63.133(d)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: SC 2 PERMIT

Description: Failure to adequately conduct the 2001 seal gap measurements and generate raw data and

calculations relating to external floating roof tank 332T1-1.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: SC5C PERMIT

Description: Failure to conduct stack testing of incinerator 55H2 within 60 days of start-up of the facilities.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.152(c)(2)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: Failed to submit a complete periodic report. Specifically, the periodic report submitted on April 25, 2000 for the October 1999 to March 2000 reporting period did not reference or include data pertaining to incinerator EPN 55H2.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113,120

40 CFR Part 63, Subpart G 63.118(f)(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit complete periodic reports.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113,120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)(1)

40 CFR Part 63, Subpart G 63.120(d)(2)(i) 40 CFR Part 63, Subpart G 63.122(b)

Rgmt Prov: SC2 PERMIT

Description: Failure to have an adequate monitoring plan for absorbers 320S322-1 and 320S322-2, that

ensures the absorbers are being properly operated and maintained.

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Not specified PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rates Table (MAERT) contained in TCEQ Air Permit No. 38336 for waste heat boiler EPN 70Z401 by emitting VOCs at 9.52 pounds per hour (lbs./hr)

when the permitted limit is 8.89 lbs./hr.

Effective Date: 02/20/2006

ADMINORDER 2005-0555-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit #39171, SC#4 PA

Description: Equistar failed to close the automatic inlet valve to the incinerator.

Effective Date: 11/19/2007

ADMINORDER 2005-0166-AIR-E

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to report the November 17, 2004 emissions event within 24 hours after its discovery. Specifically, the emissions event that was discovered on November 17, 2004 was not reported until December 22, 2004 as documented during an investigation conducted from April 22, 2005 to May 2, 2005.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit No. 18251, SC#4 PA

Description: Failure to comply with permitted emissions imitd during an emisisons event on November 17, 2004.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Ramt Prov: O-02317, ST&C 3A(iii) OP

Description: Failure to maintain records documenting quarterly opacity observations of tank 55T12 and scrubber 55K1, as reported in a deviation report for the period of June 1, 2004 through NOvember 30, 2004 for the NTA Unit.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.146(2) 5C THC Chapter 382, SubChapter D 382,085(b)

Description: Failure to maintain records documenting the VOC concentration of the exhaust gas associted with 578T5 in order to demonstrate proper function of the carbon canister control equipment, as reported ina deviation report for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: NSR 2271, GC 8 PERMIT

Description: Failure to comply with the permitted short-term ammonia emissions limits for scrubber 55K1, as reported ina deviation report for the period of December 1, 2004 thorugh May 31, 2005 for the NTA unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: NSR 2271, GC 1 PERMIT

Description: Failure to comply with the permit representations relating to annual HTMA production, annual ammonia usage, and annual ammonia production, as reported in a deviation report for the period of June 1,

2004 through November 30, 2004 for the NTA unit.

Classification: Moderate

30 TAC Chapter 122, SubChapter B 122,132(e)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to include the following emission units in the Title V application: 55S101, 55S102, 55S103,

and 55S104.

Citation:

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to obtain authorization for the carbon absorption system on wastewater tank 57T5 prior to installation, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the

DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov: General Condition No. 1 OP

Description: Failure to operate residue strip tank 57T34 on June 12 and 28, 2004 and August 16, 2004 within temperature ranges specified in the permit application, as reported in a deviation report for the period of Une 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov: General Condition No. 8 OP Description: Failure to include all gas streams going to vent condenser 57E22 from exceeding rolling annual permitted emissions limits, as reported ina deviation report for the period of June 1, 2004 through November 30, 2004 for the DPO unit

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 18251 and N-011, SC No. 4 PA

Description: Failure to prevent unauthroized emisisons during an October 9, 2005 emissions event.

Effective Date: 01/28/2008

ADMINORDER 2006-1599-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit #18251, SC #4 PA

Description: Failure to prevent unauthorized emissions during a January 11, 2004 emissions event.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report an emissions event within 24 hours after its discovery.

Classification: Minor

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report an emissions event within 24 hours after its discovery.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No. 18251, SC No. 4 PERMIT

Description: Failure to prevent uanuthorized emissions during an emissions event that started on November 15, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: TCEQ Air Permit No. 18251 PA

Description: Failure to prevent unauthorized emissions during an emissions event that started on November 1,

2004.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: TCEQ Air Permit No. 18251, SC #4 PA

Description: Failure to prevent unauthorized emissions during an emissions event that started on November 2,

Classification: Minor

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Solutia failed to submit an emissions event report within 24 hours after discovery of the event, Incident No. 68042. Specifically, the emissions event was discovered on November 12, 2005 at 0944, but

was not reported until November 15, 2005 at 1441.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: No. 18251, Special Condition No. 4 PERMIT

Description: Solutia failed to prevent unauthorized emissions during an emissions event, Incident 68043, that

occurred on November 12, 2005 and lasted 1 hour and 25 minutes.

Any criminal convictions of the state of Texas and the federal government.

Chronic excessive emissions events. C.

The approval dates of investigations. (CCEDS Inv. Track, No.) D.

)IOV	ar dates or in	restigations. (CCE
1	07/22/2003	(157054)
2	08/14/2003	(148336)
3	08/14/2003	(148343)
4	08/19/2003	(149876)
5	08/21/2003	(151361)
6	08/21/2003	(151374)
7	08/25/2003	(150697)
8	08/25/2003	(294923)
9	09/11/2003	(248057)
10	09/11/2003	(248048)
11	09/23/2003	(294925)
12	10/21/2003	(294927)
13	10/27/2003	(281097)
14	10/29/2003	(253450)
15	10/29/2003	(253464)
16	11/12/2003	(253266)

17 11/12/2003 (252275)

18 11/21/2003 (294928)

19 11/25/2003 (255837)

20 11/25/2003 (255830)

21 11/25/2003 (250820)

22 11/25/2003 (255834)

23 11/25/2003 (255835)

24 12/02/2003 (255621)

25 12/18/2003 (257385)

26 12/18/2003 (257514)27 12/23/2003 (294929)

28 01/12/2004 (258960)

29 01/12/2004 (258944)

30 01/16/2004 (255951) 31 01/23/2004 (294931)

32 02/23/2004 (294912)

33 02/26/2004 (255896)

34 02/27/2004 (262913)

35 02/27/2004 (262943)

36 02/27/2004 (263910)37 02/27/2004 (262933)

38 02/27/2004 (262947)

39 02/27/2004 (262922)40 03/22/2004

(294915)41 03/29/2004 (267307)

42 03/30/2004 (332762)

43 04/12/2004 (253529)

44 04/13/2004

(265167)45 04/16/2004 (267638)

46 04/20/2004 (294916)

	•	
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48	06/17/2004	(273007)
49	06/21/2004	(294920)
50	07/23/2004	(351912)
51	07/30/2004	(284372)
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63	10/13/2004	(337038)
64	10/22/2004	(351915)
65	10/22/2004	(351918)
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66		(333514)
67	11/03/2004	(333511)
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77	11/22/2004	(340787)
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87	12/15/2004	(351916)
88	12/16/2004	(336194)
89	12/17/2004	(344033)
90	12/20/2004	(338296)
91	12/20/2004	(335252)
92	12/20/2004	(338265)
93	12/22/2004	(381756)
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95	12/28/2004	(344974)
96	12/30/2004	(343622)
97	12/30/2004	(345394)
98	01/03/2005	(343620)
99	01/03/2005	(343624)
100	01/14/2005	(345345)
101	02/14/2005	(349294)
102	02/14/2005	(348976)
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104	02/22/2005	(381755)
105	02/24/2005	(349397)
106	02/28/2005	(347701)
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108	04/04/2005	(349690)
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112	04/06/2005	(376425)
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115	04/08/2005	(376952)
116	04/18/2005	(419587)
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118	04/25/2005	(377968)
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121	05/23/2005	(419588)
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124	05/31/2005	(379380)
125	06/08/2005	(348652)
	06/08/2005	(345346)
126	06/23/2005	, ,
127	••	(419589)
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129	07/19/2005	(440731)
130	07/21/2005	(398102)
131	08/16/2005	(440732)
132	08/19/2005	(404318)
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135	08/24/2005	(349399)
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137	08/25/2005	(401920)
138	08/29/2005	(401919)
139	08/30/2005	(401906)
	09/01/2005	•
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141	09/19/2005	(440733)
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148	12/20/2005	(435369)
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162	03/20/2006	(498075)
163	04/17/2006	(460779)
164	04/19/2006	(451614)
165	04/24/2006	(498076)
166	04/30/2006	(468247)
167	05/12/2006	(464820)
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169	05/12/2006	(464824)
170	05/12/2006	(464828)
171	05/12/2006	(464827)
172	05/16/2006	(457449)
173	05/17/2006	(458668)
174	05/18/2006	(451024)
175	05/18/2006	(449724)
176	05/22/2006	(498077)
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180	05/31/2006	(466932)
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182	06/21/2006	(467669)
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187	06/29/2006	(466692)
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192	08/17/2006	(497124)
193	08/21/2006	(520096)
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-	11/08/2006	, ,
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203	11/29/2006	(532004)
204	11/29/2006	(544350)
205	12/07/2006	(532264)
206	12/08/2006	(531936)
207	12/11/2006	(518239)
208	12/11/2006	(518235)
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214	01/23/2007	(536763)
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239	06/26/2007	(558363)
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246	08/17/2007	(571122)
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253	08/30/2007	(571497)
254	09/20/2007	(607508)
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259	10/16/2007	(594030)
260	10/19/2007	• •
		(607509)
261	10/31/2007	(607507)
262	11/01/2007	(598289)
263	11/01/2007	(598293)
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265	11/06/2007	(599382)
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267	12/03/2007	(595635)
268	12/14/2007	(609886)
269	12/17/2007	(599351)
270	12/17/2007	(610670)
. 271	12/17/2007	(599355)
272	12/18/2007	(619439)
273	12/20/2007	(611714)
274		(611710)
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(595602)
      276 01/28/2008
      277
           01/29/2008
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                             (595610)
      278 02/04/2008
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                             (671946)
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      293 04/21/2008
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      297
           04/29/2008
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      299 04/29/2008
      300 04/29/2008
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                              (671627)
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      302 06/04/2008
      303 06/06/2008
                              (682013)
                              (683391)
      304 06/20/2008
                              (681880)
      305 07/02/2008
Written notices of violations (NOV). (CCEDS Inv. Track. No.)
          Date: 07/31/2003
                                  (294923)
                                                                                 Classification
                                                                                                  Moderate
          Self Report?
                          YES
                              30 TAC Chapter 305, SubChapter F 305.125(1)
          Citation:
                              TWC Chapter 26 26.121(a)
                              Failure to meet the limit for one or more permit parameter
         Description:
                                   (294928)
          Date:
                  10/31/2003
                                                                                 Classification
                                                                                                  Moderate
          Self Report?
                          YES
                              30 TAC Chapter 305, SubChapter F 305.125(1)
          Citation:
                              TWC Chapter 26 26.121(a)
                              Failure to meet the limit for one or more permit parameter
          Description:
          Date:
                  03/30/2004
                                   (332762)
          Self Report?
                                                                                 Classification
                                                                                                  Moderate
                              30 TAC Chapter 305, SubChapter F 305.125(1)
          Citation:
                              30 TAC Chapter 305, SubChapter F 305.125(17)
                              NON-RPT VIOS FOR MONIT PER OR PIPE
          Description:
                                   (294920)
          Date:
                  05/31/2004
                                                                                 Classification
                                                                                                  Moderate
          Self Report?
                          YES
                              30 TAC Chapter 305, SubChapter F 305.125(1)
          Citation:
                              TWC Chapter 26 26.121(a)
          Description:
                              Failure to meet the limit for one or more permit parameter
                  11/16/2004
                                   (339730)
          Date:
                                                                                 Classification
                                                                                                  Moderate
          Self Report?
                          NO
                              30 TAC Chapter 116, SubChapter B 116.115(c)
          Citation:
                              5C THC Chapter 382, SubChapter A 382.085(b)
          Rgmt Prov:
                              PERMIT 18251 and N-011, S.C No. 4
                               Failure to operate the flare within MAERT limits
          Description:
                                   (340850)
          Date:
                   11/17/2004
                                                                                 Classification
                                                                                                  Moderate
          Self Report?
                              30 TAC Chapter 116, SubChapter B 116.115(c)
          Citation:
                              5C THC Chapter 382, SubChapter A 382.085(b)
                              PERMIT 18251, S.C No.4
          Rqmt Prov:
                              Failure to prevent the leaks from the valves 30HIC4-A/B and caused the release of air
          Description:
                               contaminants from the emission point which is not listed in the MAERT.
                   11/18/2004
                                   (341009)
          Date:
```

(619440)

275 01/17/2008

Self Report?

Citation:

E.

Rqmt Prov: PERMIT 18251, S.C. No.4

Description: Failure to prevent tripping of the boiler (30H5) and relit the burners in a timely manner and caused the release of air pollutants from the emission point that was not listed in the MAERT.

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Classification

Moderate

(340787) Date: 11/22/2004

Classification Moderate Self Report?

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)

Failure to to submit the initial notification of the emissions event within 24 hours after Description:

the start of incident.

Classification Moderate Self Report? NO

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

PERMIT 32151, S.C. No.1 Ramt Prov

Description: Failure to limit the emissions from the scrubber within the MAERT limits.

Date: 12/13/2004 (262649)

Self Report? Classification Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b) PA TCEQ Air Permit No. 18251, SC #4 Ramt Prov:

Solutia failed to prevent moisture from entering the igniter unit on the flare Description:

Date: 12/20/2004 (335252)

Self Report? Classification Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

PA TCEQ Air Permit #18251, SC #1

Ramt Prov:

Sterling Chemicals failed to prevent external corrosion on a pipeline. Description:

Date: 12/31/2004 (351918)

Self Report? Classification Moderate

30 TAC Chapter 305, SubChapter F 305,125(1) Citation:

TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter Description:

(343620)Date: 01/03/2005

Classification Moderate

Self Report?

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: PA TCEQ Air Permit No. 38336, SC #4

Solutia inadvertently sent steam through the drain line to the process sewer increasing Description: the pressure in the process sewer tank.

Self Report? NO Classification Minor

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B) Citation:

Failure to report an emissions event (Incident #45511) that occurred at the AN7 Unit in Description:

a timely manner.

Date: 02/14/2005 (348976)Self Report? Classification Moderate

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Solutia failed to prevent a fire suppression discharge which resulted in a release of 145

pounds (lbs) of Halon 1301 (bromotrifluoromethane).

Date: 04/04/2005

Classification Self Report? Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: The regulated entity failed to prevent a shutdown of the AN2 waste heat boiler due to

the malfunction of the valve positioner.

Self Report? NO Classification Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description: Solutia, Inc., - Chocolate Bayou Plant failed to identify on the emissions event report

the permit number authorization.

Date: 07/21/2005 (398102)

Self Report? Classification Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: PERMIT TCEQ Permit #18251, SC #4

Description: Solutia failed to include the facility's authorization limit and number on the final report.

Self Report? NO Classification Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description: Solutia failed to include the facility's authorization limit and number on the final report.

Date: 08/24/2005 (377022)

Self Report? Classification Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT 18251 SC 4 Solutia failed to properly tighten a valve. Description:

08/24/2005 (349399)Date:

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PA TCEQ Air Permit No. 38998, SC#4

Description:

The regulated entity failed to prevent a leak in a propylene pump.

Self Report?

NO

Classification

Moderate

Minor

Moderate

Moderate

Moderate

Moderate

Major

Moderate

Moderate

Moderate

Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(8) failed to identify the permit number representing the propylene pump in the emissions

Description:

09/30/2005 (468248)

Date: Self Report? Citation:

YES

event report.

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter

Date:

Citation:

10/31/2005

(468249)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

Date: 02/17/2006

(405519)

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

Citation:

PERMIT O-02325

Rgmt Prov: Description:

Failure to comply with the requirements of 30 TEX. ADMIN. CODE Chapter 106.472(9).

Date:

03/02/2006

(457603)

PERMIT SC 2

Self Report? Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

Description:

Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak from the heat exchangers into the water of cooling towers E379CT3,

E379CT4, and 70382EG.

NO Self Report?

2A TWC Chapter 7, SubChapter A 7.101

Citation: Ramt Prov:

ORDER Ordering Provision 3.a.

Description:

Failure to comply with ordering provisions of the Commission Order Docket No. 2002-

0174-AIR-E. (485504) 07/25/2006

Date: Self Report?

NO

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PERMIT No. 18251, Special Condition 4

Description:

Failure to prevent unauthorized emissions.

Self Report? Citation:

30 TAC Chapter 101, SubChapter F 101,221(a)

Failure to maintain the AN2 Flare in good working order during facility operations.

Description: Date:

07/31/2006 (520096)

Self Report?

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter

Date: 08/31/2006

(520097)

(480128)

Self Report?

Classification

Moderate

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description: Date:

Failure to meet the limit for one or more permit parameter

Self Report?

08/31/2006

Classification

Citation:

NO

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Failure to maintain the tank throughputs for the acetic tank and water circulating tank as represented in the permit application dated February 29, 2000 for the TCEQ Permit

no. 38336.

Self Report?

NO

Classification

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: PERMIT 38336, Special Condition 23.E OP O-02324, Special Condition 18 OP O-02324, Special Condition 1A Description: Failure to install caps/plugs/flanges on eight open-ended lines in unit 70ANFUG. Self Report? NO Classification Minor 30 TAC Chapter 115, SubChapter D 115.352(2) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63,168(f)(2) 5C THC Chapter 382, SubChapter D 382,085(b) OP O-02324, Special Condition 1A Ramt Prov: Failure to conduct a first attempt at repair on 1 valve within five calendar days after a Description: leak was detected in the AN 7 Unit. Self Report? NO Classification Minor 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122,143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: PERMIT 38336, Special Condition 12B OP O-02324, Special Condition 18 Description: Failure to maintain three pilots on the flare 70Z522. Self Report? NO Classification Moderate 30 TAC Chapter 116, SubChapter B 116,115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) PERMIT 38336, Special Condition 4 Ramt Prov: PERMIT 38336, Special Condition 8A OP O-02324, Special Condition 18 Description: Failure to maintain the NOx emissions from the boiler 70Z401 within the permit limit in the AN7 Unit. Date: 11/29/2006 (532004)Self Report? NO Classification Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) Rqmt Prov: PERMIT No. 38998, Special Condition 4 Description: Failure to prevent unauthorized emissions. Date: 12/31/2006 (544352)Self Report? YES Classification Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a) Description: Failure to meet the limit for one or more permit parameter 02/16/2007 (512464)Self Report? Classification Minor Citation: 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) Ramt Prov: OP FOP O-02321, SC 12 OP FOP O-02321, SC 1A PA NSR 18251 SC 14E PA NSR 18251, SC 12E Description: Failure to cap 10 open-ended lines in HRVOC and HAP service. Date: 02/21/2007 (539360)Self Report? Classification Moderate Citation: 30 TAC Chapter 331, SubChapter D 331.63(e) Ramt Prov: PERMIT PROVISION VII.D. Description: Violation of maximum injection flow rate. 08/31/2007 (607508)Self Report? Classification Moderate Citation: 2D TWC Chapter 26, SubChapter A 26,121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter 09/27/2007 (594475)Self Report? Classification Minor 30 TAC Chapter 115, SubChapter D 115.352(4) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) Ramt Prov: OP FOP No. 2324, Spec. Cond 18 OP FOP No. 2324, Spec. Cond. 1A

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Date:

Date:

Date:

PERMIT NSR Permit No. 38336, Spec. Cond. 20E

Description:

Failure to seal four (4) open ended lines in VOC service during the compliance period.

Date: 10/31/2007

Self Report?

YES

Classification Moderate

Citation:

Description:

2D TWC Chapter 26, SubChapter A 26.121(a)

Failure to meet the limit for one or more permit parameter

30 TAC Chapter 305, SubChapter F 305.125(1)

Date: 01/29/2008

(595602)

Self Report?

30 TAC Chapter 122, SubChapter B 122.143(4)

Citation:

30 TAC Chapter 122, SubChapter B 122.145(2)(C)

5C THSC Chapter 382 382,085(b)

Romt Prov:

OP O-01258, General Terms and Conditions

Description:

Failure to submit the November 30, 2005 semi-annual deviation report within 30 days

after the end of the reporting period.

Self Report?

NO

Classification

Classification

Classification

Classification

Classification

Classification

Minor

Moderate

Minor

Minor

Minor

Minor

Citation:

30 TAC Chapter 122, SubChapter B 122.145(2)(A) 30 TAC Chapter 122, SubChapter B 122.146(5)(D)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: Description: OP O-01258, General Terms and Conditions

Failure to submit a complete semi-annual report and annual compliance certification

containing all terms and conditions of the permit for which compliance was not

Date:

Citation:

03/31/2008

(671947)

Self Report?

2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

Date: 04/11/2008 (618763)

Self Report? Citation:

30 TAC Chapter 115, SubChapter D 115,352(4) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b)

Rqmt Prov:

PERMIT NSR 6534 Special Condition 18E-

OP O-02319 Special Condition 1A OP O-02319 Special Condition 20 Failure to maintain open ended lines.

Description: Self Report? Citation:

NO

30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(a)(2)(i)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

OP O-02319 Special Condition 1A

Description:

Citation:

Failure to perform annual benzene tank inspections.

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)

5C THSC Chapter 382 382.085(b)

Rqmt Prov:

PERMIT NSR 6534 Special Condition 5 OP O-02319 Special Condition 1A OP O-02319 Special Condition 20

Description:

Failure to maintain heating value of fuel gas.

Self Report?

Classification Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)

5C THSC Chapter 382 382.085(b)

PERMIT NSR 6534 Special Condition 9B OP O-02319 Special Condition 1A

OP O-02319 Special Condition 20

Description:

Rqmt Prov:

Failure to maintain flame on process flare 50Z2-C.

Self Report?

NO

Classification Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

PERMIT NSR 6534 Special Condition 10F PERMIT NSR 6534 Special Condition 18F

OP O-02319 Special Condition 1A OP O-02319 Special Condition 20

Description:

Failure to monitor delay of repair components on a quarterly frequency.

Environmental audits.

Notice of Intent Date:

09/23/2004 (347742)

No DOV Associated

Notice of Intent Date:

01/03/2006

(453378)

No DOV Associated

Notice of Intent Date:

04/07/2006

Disclosure Date:

11/14/2006

Viol. Classification:

Citation:

30 TAC Chapter 115, SubChapter B 115.143(c)(3)

(462917)

30 TAC Chapter 122, SubChapter B 122.142

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(a)(3)

Description:

Failure to submit written notification to the regional office or local pollution control office for 57T5 wastewater streams subject to 115 rules. Failure to include 57T5 tank and applicable requirements in NOCS and accurately

represent in the Title V permit.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.143(c)(1)

Description:

Failure to consider all unit 57T5 VOC's in streams as HAP's.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.142

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(a)(3)

Description:

Failure to represent ch. 115, Subchapter B, Division 2 Vent Gas Controls that applies to 57T5 in the NOCS or Title V Permit , and amend the Title V permit to reflect that Tanks 57T5, 57T6, and 57T10 are surge control storage vessels that are exempt from permit requirements due to capacity.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116

30 TAC Chapter 122, SubChapter B 122,142

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(a)(3)

Description:

Failure to include or accurately represent Tank Nos. 57T3, 57T6, 57T5, 57T10, 57T11, 57T31, 57T32,

57R1-1 and 57R1-2 in the NOCS and the Title V and NSR permits.

(481532)

Notice of Intent Date:

05/25/2006

Disclosure Date:

11/14/2006

Viol. Classification: Rgmt Prov:

PERMIT 32151, SC 8A

Minor

Description:

Failure to notify the regional office 45 days prior to schedule stack sampling for scrubber 83S14 and 83S6.

Notice of Intent Date:

04/23/2007 (559025)

No DOV Associated

Notice of Intent Date:

01/31/2008

(641816)

No DOV Associated

G. Type of environmental management systems (EMSs).

Voluntary on-site compliance assessment dates.

Participation in a voluntary pollution reduction program.

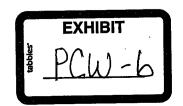
Early compliance.

N/A

Sites Outside of Texas

N/A

	Penalty Calculation Worksheet (PCW)	
Policy Revision 2 (Sept		008
TCEQ	, , , , , , , , , , , , , , , , , , ,	
DATES Assigned PCW		
RESPONDENT/FACILITY	INFORMATION	
Respondent	Solutia Inc.	
Reg. Ent. Ref. No. Facility/Site Region	RN100238682	Ì
raciiny/Site Region	12-1 loasion majoriminor cource major	
CASE INFORMATION		
Enf./Case ID No.	36002 No. of Violations 2	-
Docket No. Media Program(s)	2008-0062-AIR-E Order Type 1660 Air Enf. Coordinator Miriam Hall	
Multi-Media		
Admin. Penalty \$ 1		
	Penalty Calculation Section	\neg
TOTAL BASE PENAL	_TY (Sum of violation base penalties) Subtotal 1 \$15,0	000
TOTAL DAGL FLIVAL	11 (Outil of violation base penalties).	-
ADJUSTMENTS (+/-)		
The state of the s	ned by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.	
Compliance Histo	ory 190.0% Enhancement Subtotals 2, 3, & 7 \$28,4 The penalty was enhanced for four 1660 orders, 16 NOVs for same or	100
Notes	similar violations, and 20 other NOVs. The penalty was reduced for six	
	Notices of Audit and two disclosures of Violations.	
Culpability	No 0.0% Enhancement Subtotal 4	\$0
		**
Notes	The Respondent does not meet the culpability criteria.	
	Lander of the control	
Good Faith Effor	t to Comply 0.0% Reduction Subtotal 5 Before NOV NOV to EDPRP/Settlement Offer	\$0
Extraordinary	Deloie NOV 10 EDF-N-Voemenien Onei	
Ordinary		l
N/A	X (mark with x)	
Notes	The Respondent does not meet the good faith criteria.	
	0.0% Enhancement* Subtotal 6	\$0
Approx	Total EB Amounts \$546 *Capped at the Total EB \$ Amount Cost of Compliance \$6,200	
дрргох.	Cost of Compilative 50,200	
SUM OF SUBTOTAL	S 1-7 Final Subtotal \$43,	00
	S JUSTICE MAY REQUIRE 0.0% Adjustment	\$0
Reduces or enhances the Final S	subtotal by the indicated percentage.	
Notes		
'	Final Penalty Amount \$43,	00
STATUTORY LIMIT A	ND HISTMENIT TEXTS OF COLUMN TO THE STATE OF	
STATUTORT LIMIT A	ADJUSTMENT Final Assessed Penalty \$43,5	UU
DEFERRAL	Reduction Adjustment	\$0
	alty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.)	
		.
Notes	Deferral not offered for non-expedited settlement.	
	1	



\$43,500

PAYABLE PENALTY

Screening Date 4-Jun-2008

Docket No. 2008-0062-AIR-E

PCW

Respondent Solutia Inc. Case ID No. 36002

Reg. Ent. Reference No. RN100238682

Media [Statute] Air

>> Compliance History Site Enhancement (Subtotal 2)

Enf. Coordinator Miriam Hall

Policy Revision 2 (September 2002) PCW Revision April 29, 2008

Compliance History Worksheet

Component	Site Enhancement (Subtotal 2) Number of E	nter Number Here	Adjust.		
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	16	80%		
`	Other written NOVs	20	40%		
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	4	80%		
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%		
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%		
l l	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%		
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0% ٠		
Emissions	Chronic excessive emissions events (number of events)	0	0%		
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	6	-6%		
, locality	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	2	-4%		
	Pleas	e Enter Yes or No			
	Environmental management systems in place for one year or more	No	0%		
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%		
001	Participation in a voluntary pollution reduction program	No	0%		
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%		
	Adjustment Pe				
Repeat Violator (Sul	btotal 3)				
No	, agastnone i		-		
Compliance History	Person Classification (Subtotal 7)				
Average Performer Adjustment Percentage (Subtotal 7) 0%					
Compliance History	Summary Color of the Santal Property and Santal Property and Santal Sant				
Compliance History Notes	The penalty was enhanced for four 1660 orders, 16 NOVs for same or similar violations, a NOVs. The penalty was reduced for six Notices of Audit and two disclosures of Viola	nd 20 other ations.			
•	Total Adjustment Percentage	/Cubicials	, 3, & 7) 19		

Screening Date	4-Jun-2008	Docket No. 20	08-0062-AIR-E	PCW
Respondent	Solutia Inc.		Policy R	evision 2 (September 2002)
Case ID No.			F	CW Revision April 29, 2008
Reg. Ent. Reference No.	RN100238682			
Media [Statute]	Air			•
Enf. Coordinator				•
Violation Number				1
Rule Cite(s)		116.115(c), Permit No. 18251, x. Health & Safety Code § 382.		
Violation Description	backup pump, Pump 350f water pump, Pump 350 lasted five minutes, the volatile organic compo emissions could have b	rized emissions on November 21-3, failed to start automaticall P1-2 failed. Specifically, during total unauthorized emission we unds and 50.54 lbs of hydrogen foreseen and avoided by grative defense in 30 Tex. Adn be met.	y when the primary boiler feed g the emissions event which ere 355.59 pounds ("ibs") of n cyanide. Because these ood operating practices, the	
			Base Penalty	\$10,000
>> Environmental, Property a	Harm	haran i ah dhabi' ah willianna in in artish culant kan waski kit washi dhili anan huwin katani ar si katani in		
Release		Minor		
OR Actual		X	052	
Potential		<u> Pe</u>	rcent 25%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
		Pe	rcent 0%	
	<u>'</u>			_
		een exposed to insignificant en alth or environmental receptors		
The second secon				•
		Adju	stment \$7,500	
-				\$2,500
Violation Events	PROGRAMMA PROGRAMMA			
Number of Vid	olation Events	1Nu	mber of violation days	·
	daily	1		
	monthly			
mark only one	quarterly x		Violation Base Penalty	\$2,500
with an x	semiannual		violation Europ vollarly	42,000
	annual			
	single event			
	One qua	terly event is recommended.		
Economic Benefit (EB) for th	is violation	St	atutory Limit Test	
Estimated	d EB Amount	\$5	Violation Final Penalty Total	\$7,250
	<u> </u>	· ·		ψ., <u></u>
	7	his violation Final Assessed	Penalty (adjusted for limits)	\$7,250

	E	conomic	Benefit W	orks	sheet		
Respondent Case ID No. Rea. Ent. Reference No.	36002						g i ver de 2000 e materiale de artea.
Reg. Ent. Reference No. Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs	*****		Maria de la compania del compania del compania de la compania del compania de la compania del compania de la compania del compania dela		3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	janen in lett	<u>kon tokata, </u>
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	Name in/ale and	\$0
Record Keeping System				0.00	\$0	seemun/au sate	\$0
Training/Sampling				0.00	\$0	nte la n/a	\$0
Remediation/Disposal				0.00	\$0	n/a 's list	\$0
Permit Costs Other (as needed)	\$200	26-Nov-2007	2-Jun-2008	0.00	\$0 \$5	n/a n/a	\$0 \$5
Notes for DELAYED costs	date "Operate	High Pressure F	eedwater Pumps, V and backup pump(s	Vork Pra	actice HPFW-42.2 nes are set to auto	from the date of the 1" and associated ch start to prevent a sin	neck lists were
Avoided Costs	ANN	UALIZE [1] avoid	led costs before e	ntering	item (except for	one-time avoided c	osts)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)	·			0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$200]		TOTAL		\$5

Screening Date	4-Jun-2008	Docket	No. 2008-0062-AIR-E		PCW
Respondent	Solutia Inc.			Policy R	evision 2 (September 2002)
Case ID No.	36002			P	CW Revision April 29, 2008
Reg. Ent. Reference No.	RN100238682				İ
Media [Statute]	Air		•		
Enf. Coordinator	Miriam Hall				
Violation Number					, ,
Rule Cite(s)	30 Tex. Admin. Code § 1	16.115(c), Permit No. 65 Health & Safety Code §		i, and Tex.	
Violation Description	nitrogen oxides ("NOx") stack testing conduct Specifically, the combine	for seven Linear Alkyl B cted February 27-28, 200 led NOx MAER for Heate	llowable emission rate ("M/benzene ("LAB") Unit heate or and March 1-2 and 14, 2 ers 50H1-1, 50H1-2, 50H1- bs/hr"). During testing, the .85 lbs/hr.	rs during 2007. 3, 50H3,	
			Ва	se Penalty	\$10,000
>> Environmental, Property a	ınd Human Health Ma	trix	graene era en en en en era era en en en era Se en		
	Harm			1	
Release		Minor			
OR Actual		X		7	
Potential			Percent 25%	1	
>>Programmatic Matrix Falsification	Major Moderate	Minor			1
raisincation	Wajor Woderate	TVIII O	Percent 0%	1	
	<u> </u>	JL		1	
	Ith or the environment has I are protective of human he		ceptors as a result of this v	violation.	
			Adjustment	\$7,500	
				i	\$2,500
				i	42,000
Violation Events	ten i kalangan kalangan kalangan kalangan	and the committee will			
Number of Vic	olation Events 5	448	Number of violation da	ays	
mark only one with an x	daily monthly quarterly x semiannual annual single event		Violation Ba	se Penalty[\$12,500
Five quarterl	y events are recommended	from the last day of test 4, 2008).	ting through the screening	date (June	
	urusur rus ataus.				
Economic Benefit (EB) for th			Statutory Limit T	A TORREST PROTECTION OF PROTECTION OF THE	
Estimated	i EB Amount	\$541	Violation Final Pe	nalty Total	\$36,250
		This violation Final Ac	sessed Penalty (adjusted	for limite	\$36,250
No. i de la companya		THIS VIOLATION FINAL AS			φ30,230

	Ε	conomic	Benefit W	orks/	sheet		
Respondent Case ID No Reg. Ent. Reference No	. 36002 . RN100238682	Service Commentation		an a'amhair i			
Media Violation No		and the same	.,	n mangangan sana	g consequences and	Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs	i sa at Au			<u> </u>			Comments of the Comments of th
Equipment				0.00	\$0	\$0	\$0
Buildings			·	0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$6,000	14-Mar-2007	31-Dec-2008	1.80	\$541	Mar. ran	\$541
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs Avoided Costs Disposal Personnel				0.00 0.00	item (except for a \$0 \$0	one-time avoided o	
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0,00	\$0	\$0	\$0
ONE-TIME avoided costs [3] Other (as needed)				0.00	\$0 \$0	\$0 \$0	
				-			\$0

Compliance History

Customer/Respondent/Owner-Operator:

Regulated Entity:

ID Number(s):

CN600132856 S	olutia Inc.	Classification: AVERAGE	Rating: 2.30
RN100238682 C	CHOCOLATE BAYOU PLANT	Classification: AVERAGE	Site Rating: 1.61
AIR OPERATING PE	RMITS	ACCOUNT NUMBER	BL0038U
AIR OPERATING PE	RMITS	PERMIT	1258
AIR OPERATING PE	RMITS	PERMIT	2317
AIR OPERATING PE	RMITS	PERMIT	2318
AIR OPERATING PE		PERMIT	2319
AIR OPERATING PE		PERMIT	2320
AIR OPERATING PE		PERMIT	2321
AIR OPERATING PE		PERMIT	2322
AIR OPERATING PE		PERMIT	2323
		PERMIT	2324
AIR OPERATING PE		PERMIT	2325
AIR OPERATING PE			
PUBLIC WATER SYS		REGISTRATION	0200049
WASTEWATER		PERMIT	WQ000001000
WASTEWATER		PERMIT	TPDES0003875
WASTEWATER ·		PERMIT	TX0003875
AIR NEW SOURCE F	PERMITS	PERMIT	2271
AIR NEW SOURCE F	PERMITS	PERMIT	3046
AIR NEW SOURCE F	PERMITS	PERMIT	5065
AIR NEW SOURCE F	PERMITS	PERMIT	5084
AIR NEW SOURCE F		PERMIT	5336
AIR NEW SOURCE F		PERMIT	6534
AIR NEW SOURCE F		PERMIT	8372
AIR NEW SOURCE F		PERMIT	14488
		PERMIT	18130
AIR NEW SOURCE F			18251
AIR NEW SOURCE F		PERMIT	28694
AIR NEW SOURCE F		PERMIT	
AIR NEW SOURCE F		PERMIT	32151
AIR NEW SOURCE F		PERMIT	34029
AIR NEW SOURCE F		PERMIT	38336
AIR NEW SOURCE F	PERMITS	PERMIT	38998
AIR NEW SOURCE F	PERMITS	PERMIT	39171
AIR NEW SOURCE F	PERMITS	PERMIT	39643
AIR NEW SOURCE I	PERMITS	PERMIT	48895
AIR NEW SOURCE F	PERMITS	ACCOUNT NUMBER	BL0038U
AIR NEW SOURCE I	PERMITS	REGISTRATION	75639
AIR NEW SOURCE		REGISTRATION	76211
AIR NEW SOURCE		AFS NUM	4803900009
AIR NEW SOURCE		REGISTRATION	71232
AIR NEW SOURCE !		EPA ID	PSDTX307A
		REGISTRATION	71063
AIR NEW SOURCE			PSDTXP910
AIR NEW SOURCE		EPA ID	72689
AIR NEW SOURCE		REGISTRATION	
AIR NEW SOURCE I		REGISTRATION	72545
AIR NEW SOURCE I		REGISTRATION	74040
AIR NEW SOURCE I		REGISTRATION	73707
AIR NEW SOURCE I	PERMITS	REGISTRATION	74788
AIR NEW SOURCE I	PERMITS	REGISTRATION	75318
AIR NEW SOURCE I	PERMITS	REGISTRATION	77064
AIR NEW SOURCE	PERMITS	REGISTRATION	77079
AIR NEW SOURCE		REGISTRATION	78148
AIR NEW SOURCE		REGISTRATION	78728
AIR NEW SOURCE		REGISTRATION	79253
AIR NEW SOURCE		REGISTRATION	80379
AIR NEW SOURCE		REGISTRATION	80616
	•	REGISTRATION	83875
AIR NEW SOURCE			
AIR NEW SOURCE		REGISTRATION	83109
RADIOACTIVE WAS		LICENSE	RW0219
	JECTION CONTROL	PERMIT	WDW013
	JECTION CONTROL	PERMIT	WDW224
	JECTION CONTROL	PERMIT	WDW318
UNDERGROUND IN	JECTION CONTROL	PERMIT	WDW326



		UNDERGROUND INJECTION CONTROL	PERMIT	WDW359
•		UNDERGROUND INJECTION CONTROL	PERMIT	WDW002
		UNDERGROUND INJECTION CONTROL	PERMIT	WDW001
		INDUSTRIAL AND HAZARDOUS WASTE PROCESSING	EPA ID	TXD001700806
		INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30138
		INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD001700806
		STORMWATER	PERMIT	TXR05O891
		WATER LICENSING	LICENSE	0200049
		INDUSTRIAL AND HAZARDOUS WASTE COMPLIANCE PLANS	PERMIT	50189
		IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30138
		INDUSTRIAL AND HAZARDOUS WASTE POST CLOSURE	PERMIT	50189
		INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50189
		INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50189
Location:		On FM 2917, approximately eight miles south Highway 35, in Brazoria County, TX,	of the Texas Rating Date: September	01 07 Repeat Violator: NO
TCEQ Region:		REGION 12 - HOUSTON		
Date Compliand	ce History Prepared:	June 04, 2008		
Agency Decision	n Requiring Compliance History:	Enforcement		
Compliance Pe	riod:	June 04, 2003 to June 04, 2008		
TCEQ Staff Me	mber to Contact for Additional Info	rmation Regarding this Compliance History	F	
Name:	Miriam Hall	Phone: (512) 239-1044		
		Site Compliance History Com	ponents	
d Usadha sita	hoon in existence and/or operation	for the full five year compliance period?	Yes	
			No	
2. Has there be	en a (known) change in ownersnip	of the site during the compliance period?		

3. If Yes, who is the current owner?

Α.

N/A

4. if Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

N/A

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

1. Effective Date: 10/10/2003

ADMINORDER 2002-0174-AIR-E (1660)

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to have a monitoring plan that indicates the monitoring parameter levels that constitute a leak

from the heat exchangers into the water of cooling towers E379CT3, E379CT4, and 70382EG.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.120(b)(9)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 2 PERMIT

Description: Failure to notify the TCEQ in writing 30 days in advance of seal gap measurements taken in affiliation with the 1999, 2000, and 2001 annual external floating roof tank inspection of tanks 332T1-1 and 332T1-2.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Part 63, Subpart G 63.133(d)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: SC 2 PERMIT

Description: Failure to adequately conduct the 2001 seal gap measurements and generate raw data and

calculations relating to external floating roof tank 332T1-1.

Classification: Moderate

Citation: 31

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC5C PERMIT

Description: Failure to conduct stack testing of incinerator 55H2 within 60 days of start-up of the facilities.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.152(c)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete periodic report. Specifically, the periodic report submitted on April 25,

2000 for the October 1999 to March 2000 reporting period did not reference or include data pertaining to

incinerator EPN 55H2.

Classification: Minor

Citation:

30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.118(f)(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit complete periodic reports.

Classification: Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.120

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)(1)

40 CFR Part 63, Subpart G 63.120(d)(2)(i)

40 CFR Part 63, Subpart G 63.122(b)

Rgmt Prov: SC2 PERMIT

Description: Failure to have an adequate monitoring plan for absorbers 320S322-1 and 320S322-2, that ensures

the absorbers are being properly operated and maintained.

Classification: Moderate

Citation:

.30 TAC Chapter 116, SubChapter B 116.115(b)(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: Not specified PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rates Table (MAERT) contained in TCEQ Air Permit No. 38336 for waste heat boiler EPN 70Z401 by emitting VOCs at 9.52 pounds per hour (lbs./hr) when

the permitted limit is 8.89 lbs./hr.

2. Effective Date: 02/20/2006

ADMINORDER 2005-0555-AIR-E (1660)

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit #39171, SC#4 PA

Description: Equistar failed to close the automatic inlet valve to the incinerator.

3. Effective Date: 11/19/2007

ADMINORDER 2005-0166-AIR-E (1660)

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failed to report the November 17, 2004 emissions event within 24 hours after its discovery.

Specifically, the emissions event that was discovered on November 17, 2004 was not reported until December 22,

2004 as documented during an investigation conducted from April 22, 2005 to May 2, 2005.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov. TCEQ Air Permit No. 18251, SC#4 PA

Description: Failure to comply with permitted emissions imitd during an emisisons event on November 17, 2004.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rgmt Prov: O-02317, ST&C 3A(iii) OP

Description: Failure to maintain records documenting quarterly opacity observations of tank 55T12 and scrubber 55K1, as reported in a deviation report for the period of June 1, 2004 through NOvember 30, 2004 for the NTA

Orne.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.146(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to maintain records documenting the VOC concentration of the exhaust gas associted with 578T5 in order to demonstrate proper function of the carbon canister control equipment, as reported ina deviation

report for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)

5C THC Chapter 382, SubChapter A 382.085(b) NSR 2271, GC 8 PERMIT

Rqmt Prov: NSR 2271, GC 8 PERMIT Description: Failure to comply with the permitted short-term ammonia emissions limits for scrubber 55K1, as reported ina deviation report for the period of December 1, 2004 thorugh May 31, 2005 for the NTA unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.116(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

NSR 2271, GC 1 PERMIT

Description: Failure to comply with the permit representations relating to annual HTMA production, annual ammonia usage, and annual ammonia production, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the NTA unit.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.132(e)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to include the following emission units in the Title V application: 55S101, 55S102, 55S103,

and 55S104.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to obtain authorization for the carbon absorption system on wastewater tank 57T5 prior to installation, as reported in a deviation report for the period of June 1, 2004 through November 30, 2004 for the

DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: General Condition No. 1 OP

Description: Failure to operate residue strip tank 57T34 on June 12 and 28, 2004 and August 16, 2004 within temperature ranges specified in the permit application, as reported in a deviation report for the period of Une 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

General Condition No. 8 OP

Description: Failure to include all gas streams going to vent condenser 57E22 from exceeding rolling annual permitted emissions limits, as reported ina deviationreport for the period of June 1, 2004 through November 30, 2004 for the DPO unit.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 18251 and N-011, SC No. 4 PA

Description: Failure to prevent unauthroized emisisons during an October 9, 2005 emissions event.

4. Effective Date: 01/28/2008

ADMINORDER 2006-1599-AIR-E (1660)

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Air Permit #18251, SC #4 PA

Description: Failure to prevent unauthorized emissions during a January 11, 2004 emissions event.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report an emissions event within 24 hours after its discovery.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report an emissions event within 24 hours after its discovery.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: Permit No. 18251, SC No. 4 PERMIT

Description: Failure to prevent uanuthorized emissions during an emissions event that started on November 15,

2004.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: TCEQ Air Permit No. 18251 PA

Description: Failure to prevent unauthorized emissions during an emissions event that started on November 1,

2004.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: TCEQ Air Permit No. 18251, SC #4 PA

Description: Failure to prevent unauthorized emissions during an emissions event that started on November 2,

2004.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Solutia falled to submit an emissions event report within 24 hours after discovery of the

event,Incident No. 68042. Specifically, the emissions event was discovered on November 12, 2005 at 0944, but

was not reported until November 15, 2005 at 1441.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: No. 18251, Special Condition No. 4 PERMIT

Description: Solutia failed to prevent unauthorized emissions during an emissions event, incident 68043, that

occurred on November 12, 2005 and lasted 1 hour and 25 minutes.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
 - 1 06/20/2003 (157050)
 - 2 07/01/2003 (36597)
 - 3 07/22/2003 (157054)
 - 4 08/14/2003 (148336)
 - 5 08/14/2003 (148343)
 - 6 08/19/2003 (149876)
 - 7 08/21/2003 (151361)
 - 8 08/21/2003 (151374)
 - 9 08/25/2003 (150697)
 - 10 08/25/2003 (294923)
 - 11 09/11/2003 (248057) 12 09/11/2003 (248048)
 - 13 09/23/2003 (294925)
 - 14 10/21/2003 (294927)
 - 15 10/27/2003 (281097)
 - 16 10/29/2003 (253450)
 - 17 10/29/2003 (253464)
 - 18 11/12/2003 (253266)
 - 19 11/12/2003 (252275)
 - 20 11/21/2003 (294928)
 - 21 11/25/2003 (255837)
 - 22 11/25/2003 (255830)

5

23	11/25/2003	(250820)
24	11/25/2003	(255834)
25	11/25/2003	(255835)
26	12/02/2003	(255621)
27	12/18/2003	(257385)
28	12/18/2003	(257514)
		(294929)
29	12/23/2003	
30	01/12/2004	(258960)
31	01/12/2004	(258944)
32	01/16/2004	(255951)
33	01/23/2004	(294931)
34	02/23/2004	(294912)
		•
35	02/26/2004	(255896)
36	02/27/2004	(262913)
37	02/27/2004	(262943)
38	02/27/2004	(263910)
39	02/27/2004	(262933)
		(262947)
40	02/27/2004	` ,
41	02/27/2004	(262922)
42	03/22/2004	(294915)
43	03/29/2004	(267307)
44	03/30/2004	(332762)
45	04/12/2004	(253529)
46	04/13/2004	(265167)
47	04/16/2004	(267638)
48	04/20/2004	(294916)
49	05/25/2004	(294918)
50	06/17/2004	(273007)
		, ,
51	06/21/2004	(294920)
52	.07/23/2004	(351912)
53	07/30/2004	(284372)
54	08/03/2004	(283906)
55	08/19/2004	(351913)
56	08/31/2004	(271365)
57	09/01/2004	(271988)
58	09/01/2004	(270694)
59	09/01/2004	(272089)
60	09/01/2004	(289574)
61	09/20/2004	(351914)
		, ,
62	09/23/2004	(334052)
63	09/23/2004	(334055)
64	10/13/2004	(337045)
65	10/13/2004	(337038)
66	10/22/2004	(351915)
	10/22/2004	(351918)
67		
68	11/03/2004	(333514)
69	11/03/2004	(333511)
70	11/04/2004	(351917)
71	11/05/2004	(338995)
72	11/05/2004	(337520)
73	11/16/2004	(334879)
74	11/16/2004	(340676)
75	11/16/2004	(340661)
76	11/16/2004	(339730)
77	11/16/2004	(340570)
78	11/17/2004	(340850)
79	11/22/2004	(340787)
80	11/23/2004	(341009)
81	12/09/2004	(343333)
82	12/09/2004	(343311)
83	12/10/2004	(263071)
84	12/10/2004	(260541)
		, ,
85	12/10/2004	(263070)
86	12/13/2004	(262649)
87	12/14/2004	(343317)
88	12/14/2004	(343284)
89	12/15/2004	(351916)
90	12/16/2004	(336194)
90	12/10/2004	(000194)

91	12/17/2004	(344033)
92	12/20/2004	(338296)
93	12/20/2004	(335252)
94	12/20/2004	(338265)
95	12/22/2004	(381756)
96	12/23/2004	(336768)
97	12/28/2004	(344974)
98	12/30/2004	(343622)
99	12/30/2004	(345394)
100	01/03/2005	(343620)
101	01/03/2005	(343624)
102	01/14/2005	(345345)
102	02/14/2005	(349294)
103	02/14/2005	(348976)
105	02/21/2005	(349363)
105	02/21/2005	(349305)
	02/24/2005	, ,
107		(349397)
108	02/28/2005	(347701)
109	03/24/2005	(419586)
110	04/04/2005	(349690)
111	04/06/2005	(376386)
112	04/06/2005	(376392)
113	04/06/2005	(376398)
114	04/06/2005	(376425)
115	04/06/2005	(376432)
116	04/06/2005	(376403)
117	04/08/2005	(376952)
118	04/18/2005	(419587)
119	04/19/2005	(376908)
120	04/25/2005	(377968)
121	05/11/2005	(348724)
122	05/16/2005	(380841)
123	05/23/2005	(419588)
124	05/31/2005	(379386)
125	05/31/2005	(374702)
126	05/31/2005	(379380)
127	06/08/2005	(348652)
128	06/13/2005	(345346)
129	06/23/2005	(419589)
130	06/29/2005	(394959)
131	07/19/2005	(440731)
132	07/21/2005	(398102)
133	08/16/2005	(440732)
	08/19/2005	(404318)
134		
135	08/24/2005	(377022)
136	08/24/2005	(405509)
137	08/24/2005	(349399)
138	08/24/2005	(405513)
139	08/25/2005	(401920)
140	08/29/2005	(401919)
141	08/30/2005	(401906)
142	09/01/2005	(401916)
143	09/19/2005	(440733)
144	10/04/2005	(379884)
145	10/11/2005	(399217)
146	10/21/2005	(433182)
147	10/21/2005	(433183)
148	10/24/2005	(468248)
149	11/28/2005	(468249)
150	12/20/2005	(435369)
151	12/20/2005	(439435)
152	12/20/2005	(468250)
153	12/30/2005	(434386)
154	01/09/2006	(439878)
155	01/23/2006	(468251)
156	01/24/2006	(440227)
157	01/24/2006	(440219)
158	01/30/2006	(438969)
		•

159	02/14/2006	(453399)
160	02/14/2006	(453392)
161	02/16/2006	(405519)
162	02/21/2006	(438633)
163	03/03/2006	(457603)
164	03/20/2006	(498075)
165	04/17/2006	(460779)
166	04/19/2006	(451614)
167	04/24/2006	(498076)
168	04/30/2006	(468247)
169	05/12/2006	(464820)
170	05/12/2006	(464822)
170	05/12/2006	(464824)
172	05/12/2006	(464828)
173	05/12/2006	(464827)
174	05/16/2006	(457449)
175	05/17/2006	(458668)
176	05/18/2006	(451024)
177	05/18/2006	(449724)
178	05/22/2006	(498077)
179	05/31/2006	(466924)
180	05/31/2006	(466929)
181	05/31/2006	(466931)
182	05/31/2006	(466932)
183	06/05/2006	(463415)
184	06/21/2006	(467669)
185	06/21/2006	(480974)
186	06/23/2006	(498078)
187	06/29/2006	(482600)
188	06/29/2006	(482575)
189	06/29/2006	(466692)
190	07/10/2006	(464446)
191	07/20/2006	(467521)
192	07/25/2006	(485504)
193	07/26/2006	(520095)
194	08/17/2006	(497124)
195	08/21/2006	(520096)
196	08/23/2006	(486778)
197	08/31/2006	(480128)
198	09/15/2006	(511153)
199	09/21/2006	(520097)
200	10/23/2006	(544349)
201	10/27/2006	(516020)
202	10/27/2006	(516053)
203	11/08/2006	(518116)
204	11/29/2006	(531921)
205	11/29/2006	(532004)
206	11/29/2006	(544350)
207	12/07/2006	(532264)
208	12/08/2006	(531936)
209	12/11/2006	(518239)
210	12/11/2006	(518235)
211	12/27/2006	(544351)
	01/11/2007	(532283)
212		
213	01/18/2007	(535916)
214	01/18/2007	(536107)
215	01/22/2007	(544352)
216	01/23/2007	(536763)
217	01/30/2007	(536987)
218	01/30/2007	(536993)
219	02/16/2007	(539392)
220	02/16/2007	(539394)
221	02/16/2007	(512464)
222	02/20/2007	(539401)
223	02/21/2007	(539360)
224	02/22/2007	(539395)
225	02/22/2007	(575043)
226	02/23/2007	(539396)

227	03/12/2007	(539403)
227	03/12/2007	(555455)
228	03/12/2007	(539397)
229	03/12/2007	(539398)
		,
230	03/26/2007	(575044)
231	04/12/2007	(543396)
232	04/12/2007	(543389)
233	04/12/2007	(543359)
234	04/12/2007	(543411)
235	04/12/2007	(543393)
		, ,
236	04/19/2007	(575045)
237	05/23/2007	(575046)
		, ,
238	06/08/2007	(543508)
239	06/13/2007	(563309)
		\
240	06/25/2007	(575047)
241	06/26/2007	(558363)
0.40	07/05/2007	(565543)
242		, ,
243	07/05/2007	(564044)
244	07/06/2007	(560348)
		• ,
245	07/23/2007	(575048)
246	08/17/2007	(571117) .
247	08/17/2007	(571120)
248	08/17/2007	(571122)
249	08/17/2007	(571113)
250	08/17/2007	(571116)
251	08/22/2007	(573057)
252	08/28/2007	(566965)
253	08/28/2007	(566968)
254	08/29/2007	(572199)
		, ,
255	08/30/2007	(571497)
256	09/20/2007	(607508)
		, ,
257	09/27/2007	(594475)
258	09/27/2007	(593895)
259	09/28/2007	(565072)
260	10/04/2007	(565781)
261	10/16/2007	(594030)
		• •
262	10/19/2007	(607509)
263	10/31/2007	(607507)
264	11/01/2007	(598289)
265	11/01/2007	(598293)
266	11/05/2007	(597652)
267	11/06/2007	(599382)
268	11/15/2007	(619438)
	12/03/2007	(595635)
269		•
270	12/14/2007	(609886)
271	12/17/2007	(599351)
272	12/17/2007	(610670)
273	12/17/2007	(599355)
274	12/18/2007	(619439)
275	12/20/2007	(61171 4)
276	12/20/2007	(611710)
277	01/17/2008	(619440)
278	01/28/2008	(595602)
279	01/29/2008	(609295)
		. ,
280	02/04/2008	(595610)
281	02/13/2008	(615839)
282	02/13/2008	(615859)
283	02/14/2008	(671945)
284	02/14/2008	(609298)
285	02/15/2008	(612072)
286	02/15/2008	(618125)
287	03/11/2008	(616438)
288	03/18/2008	(671946)
289	03/18/2008	(615838)
290	03/24/2008	(639874)
291	04/03/2008	(615836)
292	04/03/2008	(617714)
293	04/11/2008	(618763)
294	04/17/2008	(671947)
	· ·	

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295 04/21/2008
                        (612070)
   296 04/22/2008
                        (640492)
   297
        04/25/2008
                        (616540)
   298 04/29/2008
                        (639707)
   299 04/29/2008
                        (639703)
   300 04/29/2008
                        (639711)
   301
        04/29/2008
                        (639708)
   302 04/29/2008
                        (639697)
   303
        05/20/2008
                        (671627)
Written notices of violations (NOV). (CCEDS Inv. Track. No.)
   1. Date: 07/31/2003
                             (294923)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 305, SubChapter F 305.125(1)
      Citation:
                         TWC Chapter 26 26.121(a)
                         Failure to meet the limit for one or more permit parameter
      Description:
   2. Date: 10/31/2003
                             (294928)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 305, SubChapter F 305.125(1)
      Citation:
                         TWC Chapter 26 26.121(a)
                         Failure to meet the limit for one or more permit parameter
      Description:
  3. Date: 03/30/2004
                             (332762)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 305, SubChapter F 305.125(1)
      Citation:
                         30 TAC Chapter 305, SubChapter F 305.125(17)
                         NON-RPT VIOS FOR MONIT PER OR PIPE
      Description:
   4. Date: 05/31/2004
                             (294920)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 305, SubChapter F 305.125(1)
      Citation:
                         TWC Chapter 26 26.121(a)
                         Failure to meet the limit for one or more permit parameter
      Description:
   5. Date: 11/16/2004
                             (339730)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 116, SubChapter B 116.115(c)
      Citation:
                         5C THC Chapter 382, SubChapter A 382.085(b)
                         PERMIT 18251 and N-011, S.C No. 4
      Ramt Prov:
                         Failure to operate the flare within MAERT limits
      Description:
  6. Date: 11/17/2004
                             (340850)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 116, SubChapter B 116.115(c)
      Citation:
                         5C THC Chapter 382, SubChapter A 382.085(b)
                         PERMIT 18251, S.C No.4
      Rgmt Prov:
                         Failure to prevent the leaks from the valves 30HIC4-A/B and caused the release of air
      Description:
                         contaminants from the emission point which is not listed in the MAERT.
  7. Date: 11/18/2004
                             (341009)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 116, SubChapter B 116.115(c)
      Citation:
                         5C THC Chapter 382, SubChapter A 382.085(b)
      Ramt Prov:
                         PERMIT 18251, S.C. No.4
                         Failure to prevent tripping of the boiler (30H5) and relit the burners in a timely manner
      Description:
                         and caused the release of air pollutants from the emission point that was not listed in the
                         MAERT.
   8. Date: 11/22/2004
                             (340787)
                                                                              Classification:
                                                                                               Moderate
      Self Report?
                         30 TAC Chapter 101, SubChapter F 101.201(a)(1)
      Citation:
                         Failure to to submit the initial notification of the emissions event within 24 hours after the
      Description:
                         start of incident.
                                                                              Classification:
                                                                                               .Moderate
      Self Report?
                     NO
      Citation:
                         30 TAC Chapter 116, SubChapter B 116.115(c)
                         5C THC Chapter 382, SubChapter A 382.085(b)
                         PERMIT 32151, S.C. No.1
      Rgmt Prov:
                         Failure to limit the emissions from the scrubber within the MAERT limits.
      Description:
                              (262649)
   9. Date: 12/13/2004
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Ε.

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 10

Self Report?

Classification:

Moderate

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PA TCEQ Air Permit No. 18251, SC #4

Description:

Solutia failed to prevent moisture from entering the igniter unit on the flare (emissions).

10. Date: 12/20/2004 (335252)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

Citation:

PA TCEQ Air Permit #18251, SC #1

Description:

Sterling Chemicals failed to prevent external corrosion on a pipeline (emissions).

11. Date: 12/31/2004 (351918)

Self Report?

Classification:

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)

Description:

Failure to meet the limit for one or more permit parameter

12. Date: 01/03/2005

(343620)

Self Report?

Classification:

Moderate

Minor

Moderate

Minor

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: Description: PA TCEQ Air Permit No. 38336, SC #4

Solutia inadvertently sent steam through the drain line to the process sewer increasing the pressure in the process sewer tank. (emissions)

Self Report?

Classification: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

Citation: Description:

Failure to report an emissions event (Incident #45511) that occurred at the AN7 Unit in a

timely manner.

13. Date: 02/14/2005

(348976)

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Citation:

Solutia failed to prevent a fire suppression discharge which resulted in a release of 145

pounds (lbs) of Halon 1301 (bromotrifluoromethane).

14. Date: 04/04/2005 (349690)

Self Report?

Classification: Moderate

Classification:

Classification:

Classification:

30 TAC Chapter 116, SubChapter B 116,110(a)(1) 5C THC Chapter 382, SubChapter A 382,085(b)

Description:

Citation:

The regulated entity failed to prevent a shutdown of the AN2 waste heat boiler due to the

malfunction of the valve positioner. (emissions)

Self Report?

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Citation: Description:

Solutia, Inc., - Chocolate Bayou Plant failed to identify on the emissions event report the

permit number authorization.

15. Date: 07/21/2005

(398102)

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PERMIT TCEQ Permit #18251, SC #4

Description:

Solutia failed to include the facility's authorization limit and number on the final report

and unauthorized emissions.

Self Report?

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

Description:

Solutia failed to include the facility's authorization limit and number on the final report.

16. Date: 08/24/2005 (377022)

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PERMIT 18251 SC 4

Description:

Solutia failed to properly tighten a valve.

17. Date: 08/24/2005

(349399)

Classification:

Moderate

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

PA TCEQ Air Permit No. 38998, SC#4

Description:

The regulated entity failed to prevent a leak in a propylene pump.

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.201(b)(8) Citation:

failed to identify the permit number representing the propylene pump in the emissions Description:

Classification:

Moderate

Moderate

event report.

(468248) 18. Date: 09/30/2005

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter

Description: (468249)

19 Date: 10/31/2005 Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

20. Date: 02/16/2006 (405519)

Classification: Self Report?

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

Failure to record quarterly opacity observation on Unit ID: 350H1-1 Description:

Classification: Moderate Self Report? NO

30 TAC Chapter 115, SubChapter B 115.142(1)(E) Citation:

Solutia, Inc., failed to equipt Unit IDs:P-10 and P-13, with a Close-Vent system. Description:

(405519)21. Date: 02/17/2006

Self Report? NO Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation:

Ramt Prov: **PERMIT 0-02325** Failure to comply with the requirements of 30 TEX. ADMIN. CODE Chapter 106.472(9). Description:

22. Date: 03/02/2006

Classification: Moderate Self Report?

30 TAC Chapter 113, SubChapter C 113.120 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(c)(1)(ii)

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT SC 2

Rqmt Prov: Failure to have a monitoring plan that indicates the monitoring parameter levels that Description:

constitute a leak from the heat exchangers into the water of cooling towers E379CT3,

E379CT4, and 70382EG.

Classification: Major Self Report? NO

2A TWC Chapter 7, SubChapter A 7.101 Citation:

ORDER Ordering Provision 3.a. Ramt Prov:

Failure to comply with ordering provisions of the Commission Order Docket No. 2002-Description: 0174-AIR-E.

(485504)23. Date: 07/25/2006

Classification:

Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: PERMIT No. 18251, Special Condition 4

Failure to prevent unauthorized emissions. Description:

Self Report? Classification: Moderate

30 TAC Chapter 101, SubChapter F 101.221(a) Citation: Failure to maintain the AN2 Flare in good working order during facility operations.

Description:

24. Date: 07/31/2006 (520096)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter Description:

(520097)25. Date: 08/31/2006

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)

Failure to meet the limit for one or more permit parameter (480128)26. Date: 08/31/2006

Classification: Moderate Self Report?

Citation:

Description:

5C THC Chapter 382, SubChapter D 382.085(b)

Failure to maintain the tank throughputs for the acetic tank and water circulating tank as Description:

represented in the permit application dated February 29, 2000 for the TCEQ Permit no.

38336.

Self Report?

NO

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT 38336, Special Condition 23.E.

OP O-02324, Special Condition 18 OP O-02324, Special Condition 1A

Description:

Failure to install caps/plugs/flanges on eight open-ended lines in unit 70ANFUG.

Self Report?

Citation:

30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(2)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

OP O-02324, Special Condition 1A

Description:

Failure to conduct a first attempt at repair on 1 valve within five calendar days after a

leak was detected in the AN 7 Unit.

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

PERMIT 38336, Special Condition 12B

OP O-02324, Special Condition 18

Description:

Failure to maintain three pilots on the flare 70Z522.

Classification: Moderate

Minor

Moderate

Moderate

Minor

Moderate

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

PERMIT 38336, Special Condition 4

PERMIT 38336, Special Condition 8A OP O-02324, Special Condition 18

Description:

Failure to maintain the NOx emissions from the boiler 70Z401 within the permit limit in

the AN7 Unit.

27. Date: 11/29/2006 (532004)

Self-Report?

Classification:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT No. 38998, Special Condition 4

Description:

Citation:

Failure to prevent unauthorized emissions.

28. Date: 12/31/2006

(544352)

Self Report?

30 TAC Chapter 305, SubChapter F 305,125(1)

TWC Chapter 26 26.121(a)

Description:

Citation:

Failure to meet the limit for one or more permit parameter

29. Date: 02/16/2007

(512464)

Self Report? Citation:

30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

OP FOP O-02321, SC 12 OP FOP O-02321, SC 1A PA NSR 18251 SC 14E PA NSR 18251, SC 12E

Description:

Failure to cap 10 open-ended lines in HRVOC and HAP service.

30. Date: 02/21/2007

(539360)

Self Report?

30 TAC Chapter 331, SubChapter D 331.63(e)

Citation: Ramt Prov:

PERMIT PROVISION VII.D.

13

Description:

Violation of maximum injection flow rate.

31. Date: 08/31/2007

Self Report?

Classification:

Classification:

Classification:

Classification:

Moderate

Minor

Moderate

Minor

Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)

(607508)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

32. Date: 09/27/2007

(594475)

Self Report? Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

OP FOP No. 2324, Spec. Cond 18 OP FOP No. 2324, Spec. Cond. 1A

PERMIT NSR Permit No. 38336, Spec. Cond. 20E

Description:

Failure to seal four (4) open ended lines in VOC service during the compliance period.

33. Date: 10/31/2007

(619438)

Self Report?

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Citation:

Failure to meet the limit for one or more permit parameter

Description:

Citation:

34. Date: 01/29/2008 (595602)

Self Report?

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(C)

5C THSC Chapter 382 382.085(b)

Rqmt Prov:

OP O-01258, General Terms and Conditions

Description:

Failure to submit the November 30, 2005 semi-annual deviation report within 30 days

after the end of the reporting period.

Self Report?

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Classification: Minor

Classification:

Classification:

Citation:

30 TAC Chapter 122, SubChapter B 122.146(5)(D)

5C THSC Chapter 382 382.085(b)

Rqmt Prov:

OP O-01258, General Terms and Conditions

Description:

Failure to submit a complete semi-annual report and annual compliance certification containing all terms and conditions of the permit for which compliance was not achieved.

35. Date: 03/31/2008

(671947)

Self Report? Citation:

2D TWC Chapter 26, SubChapter A 26.121(a)

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to meet the limit for one or more permit parameter

36. Date: 04/11/2008 (618763)

Self Report? Citation:

30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

PERMIT NSR 6534 Special Condition 18E

OP O-02319 Special Condition 1A OP O-02319 Special Condition 20

Description:

Failure to maintain open ended lines.

Self Report?

Classification:

Classification:

Minor

Minor

Moderate

Minor

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(a)(2)(i)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

OP O-02319 Special Condition 1A

Description: Self Report? Failure to perform annual benzene tank inspections.

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)

5C THSC Chapter 382 382.085(b)

Ramt Prov: PERMIT NSR 6534 Special Condition 5

OP O-02319 Special Condition 1A OP O-02319 Special Condition 20

Description:

Failure to maintain heating value of fuel gas.

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

PERMIT NSR 6534 Special Condition 9B

OP O-02319 Special Condition 1A OP O-02319 Special Condition 20

Description:

Failure to maintain flame on process flare 50Z2-C. (emissions - 20 minute release) Classification:

Classification:

Minor

Self Report? Citation:

30 TAC Chapter 115, SubChapter D 115,354(2)(C) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4)

5C THSC Chapter 382 382.085(b)

Ramt Prov:

PERMIT NSR 6534 Special Condition 10F PERMIT NSR 6534 Special Condition 18F OP O-02319 Special Condition 1A OP O-02319 Special Condition 20

Description:

Failure to monitor delay of repair components on a quarterly frequency.

F. Environmental audits.

1. Notice of Intent Date: 09/23/2004

04/07/2006

(347742)

No DOV Associated

2. Notice of Intent Date: 01/03/2006 (453378)

No DOV Associated

3. Notice of Intent Date:

(462917)

Disclosure Date:

11/14/2006

Viol. Classification: Minor

Citation:

30 TAC Chapter 115, SubChapter B 115.143(c)(3)

30 TAC Chapter 122, SubChapter B 122.142

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(a)(3)

Description: Failure to submit written notification to the regional office or local pollution control office for 57T5 wastewater streams subject to 115 rules. Failure to include 57T5 tank and applicable requirements in NOCS and accurately represent in the Title V permit.

Viol. Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.143(c)(1)

Description: Failure to consider all unit 57T5 VOC's in streams as HAP's.

Viol. Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.142

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(a)(3)

Description:

Failure to represent ch. 115, Subchapter B, Division 2 Vent Gas Controls that applies to 57T5 in the NOCS or Title V Permit, and amend the Title V permit to reflect that Tanks 57T5, 57T6, and 57T10 are surge control storage vessels

that are exempt from permit requirements due to capacity.

Viol. Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116

30 TAC Chapter 122, SubChapter B 122.142

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(a)(3)

Description: Failure to include or accurately represent Tank Nos. 57T3, 57T6, 57T5, 57T10, 57T11, 57T35, 57T32, 57R1-1

and 57R1-2 in the NOCS and the Title V and NSR permits.

4. Notice of Intent Date: 05/25/2006 (481532)

2. Disclosure Date:

11/14/2006

Viol. Classification: Minor

Rqmt Prov: PERMIT 32151, SC 8A

Description: Failure to notify the regional office 45 days prior to schedule stack sampling for scrubber 83S14 and 83S6.

5. Notice of Intent Date: 04/23/2007 (559025)

No DOV Associated

6. Notice of Intent Date: 01/31/2008

(641816)

No DOV Associated

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
AGAINST	§	TEXAS COMMISSION ON
SOLUTIA INC.	§	
RN100238682	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2008-0062-AIR-E

I. JURISDICTION AND STIPULATIONS

At its ______ agenda, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Solutia Inc. ("Solutia") under the authority of Tex. Water Code ch. 7 and Tex. Health & Safety Code ch. 382. The Executive Director of the TCEQ, represented by the Litigation Division, and Solutia, represented by Mr. Eric Groten of the law firm of Vinson & Elkins, LLP, appear before the Commission and together stipulate that:

- 1. Solutia owns and operates an organic chemical production plant located at Farm-to-Market Road 2917, approximately 11 miles southeast of Alvin and approximately 8 miles south of the intersection of Texas Highway 35 and FM 2917, in Brazoria County, Texas (the "Plant"). The Plant consists of one or more sources as defined in Tex. Health & Safety Code § 382.003(12).
- 2. This Agreed Order is entered into pursuant to TEX. WATER CODE §§ 7.051 and 7.070. The Commission has jurisdiction of this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and TCEQ rules.
- 3. The Commission and Solutia agree that the Commission has jurisdiction to enter this Agreed Order, and that Solutia is subject to the Commission's jurisdiction.
- 4. Solutia received notice of the violations alleged in Section II ("Allegations") on or about September 3, October 21, and December 19, 2007, and February 3, and 20, April 26 and 30, June 25, July 8, and August 4, 2008.
- 5. The occurrence of the violations is in dispute and the entry of this Agreed Order shall not constitute an admission by Solutia of the violations alleged in Section II ("Allegations"), nor of any statute or rule.

- 6. An administrative penalty in the amount of one hundred seventeen thousand forty-eight dollars (\$117,048.00) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Solutia has paid fifty-eight thousand five hundred twenty-four dollars (\$58,524.00) of the administrative penalty. Fifty-eight thousand five hundred twenty-four dollars (\$58,524.00) shall be conditionally offset by Solutia's completion of a Supplemental Environmental Project as defined in Attachment A and incorporated herein by reference. Solutia's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
- 7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director of the TCEQ and Solutia have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 9. The Executive Director recognizes that on October 26, 2006, Solutia submitted an application to amend NSR Permit No. 38336 to increase the permitted maximum allowable emissions rate for Nitrogen Oxide ("NOx") for the AN-7 Process Air Startup Heater ("EPN 70H101-1") and on August 28, 2008, Solutia received an amended permit with increased emissions rates for the startup heater. Testing conducted on March 28, 2008 demonstrated that the heater was in compliance with the new revised NOx and CO maximum allowable emission rates.
- 10. The Executive Director recognizes that on September 24, 2007, Solutia revised the process for reporting annual compliance certifications and deviation reports, and trained staff responsible for filing those reports.
- 11. The Executive Director recognizes that on October 2, 2007, personnel were retrained for timely reporting of emissions events to the agency and on November 8 and 9, 2007, Solutia revised and re-trained personnel on the applicable crossover procedure for the Waste Heat Boiler system.
- 12. The Executive Director recognizes that Solutia, on April 22, 2008, reduced fuel firing rates based on current stack test established emission rates to reduce NOx from Heaters 50H1-1, 50H1-2, 50H1-3, 50H3, 51H1, 51H5 and 51H6 to the allowable level set forth in the permit.
- 13. The Executive Director recognizes that Solutia on June 2, 2008 revised its standard operating procedures "Operate High Pressure Feedwater Pumps, Work Practice HPFW-42.21" and associated check lists to require the operator to verify that the pump and backup pump(s) switches are set to "auto" start to prevent an incident similar to the November 26, 2007, emissions event.

- 14. The Executive Director recognizes that on May 15, 2008, Solutia submitted procedures designed to prevent a recurrence of the September 26, 2007 emissions event, and on June 5, 2008, it submitted corrective actions for the October 30, 2007 emissions event.
- 15. The Executive Director recognizes that on September 26, 2008, Solutia submitted procedures designed to prevent a recurrence of the February 29 and March 2, 2008 emissions events.
- 16. The Executive Director recognizes that on November 14, 2008, Solutia submitted procedures designed to prevent a recurrence of the March 27, 2008 emissions event.
- 17. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Solutia has not complied with one or more of the terms or conditions in this Agreed Order.
- 18. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 19. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

Solutia is alleged to have violated:

- 1. 30 Tex. Admin. Code § 116.115(c); Permit No. 38336 Special Condition No. 4, and Tex. Health & Safety Code § 382.085(b), by failing to comply with a permit limit of 4.50 pounds per hour ("lbs/hr") for NOx emissions from the AN-7 Process Air Startup Heater ("70H101-1"), as documented during a record review conducted on February 19, 2007. Specifically, it was determined that NOx emissions from 70H101-1 were 5.39 lbs/hr.
- 2. 30 Tex. Admin. Code § 117.8000 and Tex. Health & Safety Code § 382.085(b), by failing to test for compliance with the carbon monoxide ("CO") emission limits for 70H101-1 during the reference method stack test conducted on February 19, 2007, as documented during a record review conducted on November 27, 2007.
- 3. 30 Tex. Admin. Code §§ 122.143(4), 122.145(2)(A), and 122.146(1); Operating Permit No. O-02319, General Terms and Conditions; and Tex. Health & Safety Code § 382.085(b), by failing to submit the Annual Compliance Certification for the period beginning November 29, 2004 through November 28, 2005, with the required certification language. In addition,

Solutia failed to identify this deficiency in the semi-annual deviation report for the time period of November 28, 2005 through May 28, 2006.

- 4. 30 Tex. Admin. Code § 116.115(c); Air Permit No. 18251, Special Condition No. 4; and Tex. Health & Safety Code § 382.085(b), by failing to prevent unauthorized emissions. Specifically, 98.7 lbs of hydrogen cyanide ("HCN"), 357.4 lbs of acrylonitrile ("AN") and 5 lbs of acrolein were released when Solutia failed to open the manual block valve during crossover of Acrylonitrile Unit 3 off gas to the Acrylonitrile Unit 2 Waste Heat Boiler resulting in the over pressure of the system, causing an emissions event which began on August 5, 2007, and lasted for five minutes (Incident No. 95610), as documented during an record review conducted on September 10, 2007. Since this emissions event was avoidable and reported late, Solutia failed to meet the demonstration criteria for an affirmative defense under 30 Tex. Admin. Code § 101.222.
- 5. 30 Tex. Admin. Code § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b), by failing to submit the initial notification within 24 hours of discovery of an emissions event that started on August 5, 2007, as documented during an record review conducted on September 10, 2007. Specifically, the incident started and ended on August 5, 2007, but the initial notification was not submitted until August 8, 2007.
- 6. 30 Tex. Admin. Code § 116.115(c); Air Permit No. 18251, Special Condition No. 4, and Tex. Health & Safety Code § 382.085(b), by failing to prevent an unauthorized emissions event which occurred on September 26, 2007, as documented during an investigation conducted on December 4, 2007. Specifically, approximately 189 lbs of AN, 308 lbs of HCN, and 258 lbs of volatile organic compounds ("VOCs") were released from emissions point number ("EPN") 30H5 during the 36 minute event. The emission limits for AN, HCN and VOCs are 2.09, 1.26 and 12.04 lbs/hr, respectively. Since the emissions event was avoidable, it does not meet the demonstration criteria for an affirmative defense in 30 Tex. Admin. Code § 101.222(b)(1-11).
- 7. 30 Tex. Admin. Code § 116.115(c); Air Permit No. 18251, Special Condition No. 4; and Tex. Health & Safety Code § 382.085(b), by failing to prevent an unauthorized emissions event which occurred on October 30, 2007, as documented during an investigation conducted on January 31, 2008. Specifically, approximately 99 lbs of AN, 210 lbs of HCN and 535 lbs of VOCs were released from EPN 30H5 during the one hour and nine minute event. The emission limits for AN, HCN and VOCs are 2.09, 1.26 and 12.04 lbs/hour, respectively. Since the emissions event was avoidable, it does not meet the demonstration criteria for an affirmative defense in 30 Tex. Admin. Code § 101.222(b)(1-11).
- 8. 30 Tex. Admin. Code §§ 101.20(3) and 116.115(c); Tex. Health & Safety Code § 382.085(b); and Permit No. 38336/PSD-TX-910, Special Condition No. 4, by failing to comply with permitted emissions limits. Specifically, during a reference method stack test

conducted on March 28, 2008, it was determined that NOx and CO emissions from the AN-7 Process Air Startup Heater, EPN 70H101-2 were 8.62 lbs/hr and 13.47 lbs/hr respectively. The emission limits for this EPN are 4.50 lbs/hr for NOx and 6.0 lbs/hr for CO.

- 9. 30 Tex. Admin. Code § 116.115(c); Tex. Health & Safety Code § 382.085(b); and Permit No. 18251, Special Condition No. 4, by failing to prevent unauthorized emissions. Specifically, an emissions event occurred on February 29, 2008 due to a preventable electrical spike at EPN 31H4, which lasted for one hour and 43 minutes and resulted in the release of 15.20 lbs of HCN and 526.80 lbs of propylene. The emission limits for this EPN are 1.26 lbs/hr for HCN and 4.01 lbs/hr for VOC. Since this emissions event could have been avoided by good design, operation and maintenance practices, it did not meet the demonstration criteria for an affirmative defense in 30 Tex. Admin. Code § 101.222.
- 10. 30 Tex. Admin. Code § 116.115(c); Tex. Health & Safety Code § 382.085(b); and Permit No. 18251, Special Condition No. 4, by failing to prevent unauthorized emissions. Specifically, an emissions event occurred on March 2, 2008 due to a preventable electrical spike at EPN 31H4, which lasted for 37 minutes and resulted in the release of 166 lbs of propylene. The emission limits for this EPN are 4.01 lbs/hr for VOC. Since this emissions event could have been avoided by good design, operation and maintenance practices, it did not meet the demonstration criteria for an affirmative defense in 30 Tex. Admin. Code § 101.222.
- 11. 30 Tex. Admin. Code § 116.115(c); Tex. Health & Safety Code § 382.085(b); and Permit No. 18251, Special Condition No. 4, by failing to prevent unauthorized emissions. Specifically, an emissions event occurred on March 27, 2008 due to a loss of air flow from operator error at EPN 30H5, which lasted for one hour and 51 minutes and resulted in the release of 4,057 lbs of VOC, 4,714 lbs of CO and 61 lbs of HCN. The emission limits for this EPN are 3.57 lbs/hr for VOC, 31 lbs/hr for CO and 1.26 lbs/hr for HCN. Since this emissions event could have been avoided by good design, operation and maintenance practices, and it was improperly reported, it did not meet the demonstration criteria for an affirmative defense in 30 Tex. Admin. Code § 101.222.
- 12. 30 Tex. ADMIN. CODE § 101.201(b)(1) and Tex. Health & Safety Code § 382.085(b), by failing to properly report an emissions event. Specifically, the final report for the March 27, 2008 emissions event did not contain the authorized limits for several pollutants that were involved in the event.
- 13. 30 Tex. Admin. Code § 116.115(c); Tex. Health & Safety Code § 382.085(b); and Permit No. 18251, Special Condition No. 4, by failing to prevent unauthorized emissions on November 26, 2007 when the secondary backup pump, Pump 350P1-3 failed to start automatically when the primary boiler feed water pump, Pump 350P1-2 failed. Specifically,

during the emissions event which lasted five minutes, the total unauthorized emissions were 355.59 lbs of VOCs and 50.54 lbs of HCN. Because these emissions could have been foreseen and avoided by good operating practices, the demonstration criteria for an affirmative defense in 30 Tex. ADMIN. CODE § 101.222 could not be met.

14. 30 TEX. ADMIN. CODE § 116.115(c); TEX. HEALTH & SAFETY CODE § 382.085(b); and Permit No. 6534, Special Condition No. 1, by failing to comply with the combined maximum allowable emission rate ("MAER") for NOx for seven Linear Alkyl Benzene ("LAB") Unit heaters during stack testing conducted on February 27-28, 2007 and March 1-2 and 14, 2007. Specifically, the combined NOx MAER for Heaters 50H1-1, 50H1-2, 50H1-3, 50H3, 51H1, 51H5 and 51H6 is 18.0 lbs/hr. During testing, the actual combined rate was 21.85 lbs/hr.

III. DENIALS

Solutia generally denies the allegations contained in Section II ("Allegations").

IV. ORDER

1. It is, therefore, ordered by the TCEQ that Solutia is assessed an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Solutia's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from considering requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "Texas Commission on Environmental Quality" and shall be sent with the notation "Re: Solutia Inc., Docket No. 2008-0062-AIR-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

2. Solutia shall implement and complete a Supplemental Environmental Project in accordance with Tex. Water Code § 7.067. Fifty-eight thousand five hundred twenty-four dollars (\$58,524.00) of the assessed penalty shall be offset with the condition that Solutia implement the SEP defined in Attachment A. Solutia's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.

- 3. The provisions of this Agreed Order shall apply to and be binding upon Solutia. Solutia is ordered to give notice of this Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
- 4. If Solutia fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Solutia's failure to comply is not a violation of this Agreed Order. Solutia has the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Solutia shall notify the Executive Director within seven days after Solutia becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Solutia shall be made in writing to the Executive Director. Extensions are not effective until Solutia receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 6. This Agreed Order, issued by the Commission, shall not be admissible against Solutia in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 7. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
- 8. Under 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142, the effective date of this Agreed Order is the date of hand-delivery of the Order to Solutia, or three days after the date on which the Commission mails notice of the Order to Solutia, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
For the Executive Director	424 2009 Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that Solutia's failure to comply with the Ordering Provisions, if any, in this order and/or Solutia's failure to timely pay the penalty amount, may result in:

- A negative impact on Solutia's compliance history;
- Greater scrutiny of any permit applications submitted by Solutia;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against Solutia;
- Automatic referral to the Attorney General's Office of any future enforcement actions against Solutia; and
- TCEQ seeking other relief as authorized by law.

Signature

__

Paul Cartidge
Name (Printed or typed)
Authorized representative of

Solutia Inc.

2 9 09 Date

> Plant Manager Title

Attachment A Docket Number: 2008-0062-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:

SOLUTIA INC.

Penalty Amount:

One hundred seventeen thousand forty-eight dollars (\$117,048)

SEP Offset Amount:

Fifty-eight thousand five hundred twenty-four dollars (\$58,524)

Type of SEP:

Pre-approved

Third-Party Recipient:

Houston-Galveston Area Emission Reduction Credit

Organization ("AERCO") Clean Cities/Clean Vehicles Program

Location of SEP:

Brazoria County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to AERCO for the *Clean Cities/Clean Vehicles Program* in Brazoria County as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, SEP funds will be used to aid local school districts and area transit agencies, and may be used to reach local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP funds will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. SEP funds will be used for the costs of retrofitting or replacing older diesel buses with alternative fueled or clean fuel diesel buses. The older "high emission" buses will be permanently retired and sold only for scrap. This project will be administered in accordance with federal, state, and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

B. Environmental Benefit

Passengers, drivers, and students in the area where school buses idle during transportation are subject to harmful diesel exhaust emission every school day. Apart from containing the ozone precursors nitrogen oxides ("NOx") and hydrocarbons ("HC"), diesel exhaust is known to cause or exacerbate a number of respiratory diseases, including asthma. Due to the more stringent emissions standards introduced by the Environmental Projection Agency (EPA), model 2007 and newer buses are also cleaner in terms of particulate matter (PM) emissions than model year 2004 buses. New NOx and HC standards phased in between 2007 and 2010 will

SOLUTIA INC. Agreed Order Docket 2008-0062-AIR-E

result in new school bus engines being 72% cleaner for HC and 90% cleaner for NOx than a bus produced to meet the 2004 federal standards for these pollutants.

This SEP will provide a discernible environmental benefit by retiring high-emission buses from service, purchasing newer, clean fuel technology buses, and replacing newer buses with fuel treatment technology that reduces PM and HC.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Houston-Galveston Area Council Houston-Galveston AERCO P.O. Box 22777 Houston, TX 77227-2777

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall submit a check for any remaining amount due made payable to "Texas Commission on Environmental Quality" with the notation "SEP Refund" and the docket number of the case, and shall send it to:

SOLUTIA INC. Agreed Order Docket 2008-0062-AIR-E

> Texas Commission on Environmental Quality Office of Legal Services Attention: SEP Coordinator, MC 175 P.O. Box 13088 Austin, Texas 78711-3088

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.